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AUTHOR Kuhns, Eileen; Martorana, S. V.
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ABSTRACT

Results of a study of the monitoring requirements of off-campus programs are presented. Summaries are provided of the monitoring requirements for off-campus, military base, and study abroad programs of member institutions of the Council on Postsecondary Accreditation. After defining types of off-campus programs, a conceptual plan is presented for analyzing monitoring requirements with regard to location of instruction vis-a-vis location of parent institution. Four major categories of monitoring concerns were identified: authority and need for the program, academic aspects, administrative aspects, and ancillary or support aspects. Differences and similarities in monitoring requirements are considered among the different organizations and regions, between the accrediting groups and the states, and among the three types of programs. A separate chapter for each of the six regions includes an overview of the requirements for the region and the states within the region. Next, narratives on requirements of the accrediting bodies and each of the states within that region are presented. Requirements of the four national associations are also covered. Finally, the findings are analyzed and implications for the postsecondary community are addressed. (SW)

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TOWARD ACADEMIC QUALITY OFF-CAMPUS:

Monitoring Requirements of Institutional Accrediting Bodies and the States For Off-Campus, Military Base, and Study Abroad Programs

Eileen Kuhns

S. V. Martorana

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The Council on Postsecondary Accreditation
One Dupont Circle, N. W., Washington, D. C. 20036

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AUTHORS' NOTE

Since this project began in 1980 many persons and many organizations have contributed time and effort in order to bring it to a successful conclusion. We especially appreciate the help of professionals in thirteen accrediting commission offices and over fifty postsecondary agencies, who first responded to our request for information about their monitoring requirements, and then responded to further requests that they confirm (or amend) our interpretation of their information.

Encouragement came from Robert Kirkwood and his staff at the Middle States Commission on Higher Education, and from Richard M. Millard and his staff at COPA. Dale Tillery from the University of California at Berkeley, who is chief consultant to a related project in the Western region, provided an in-depth review and critique of the manuscript, as did Marjorie Peace Lenn and William J. MacLeod from the COPA staff. We deeply appreciate their contributions, but of course assume full responsibility for any errors of commission or omission.

The project could not have been accomplished without the assistance "beyond the call of duty" of Louise Restak, research assistart in education administration at Catholic University. Donna Ruane, who held this position during the project's early days, and is now a graduate student in sociology at Pennsylvania State University, responded with versatility to diverse requests for assistance over the life of the project, including editing of the final manuscript. Earlier editing was skillfully accomplished by Laura Kent, now of Los Angeles, who has been editing the co-authors' manuscripts for a decade. Alison Taylor,

a Catholic University mechanical engineering student with computer skills, quickly learned "more about accreditation than she wanted to know" as she assumed responsibility for word processing input and the preparation of camera-ready copy. Richard Vranesh of the COPA staff converted that copy into the document published by COPA.

Co-authors of this volume are Eileen Kuhns, coordinator of Education Administration and associate professor in the School of Education at Catholic University, and S. V. Martorana, senior research associate in the Center for the Study of Higher Education and professor in the School of Education at Pennsylvania State University.

Eileen Kuhns is a member of the Commission on Higher Education of the Middle States Association of Colleges and Schools, and has chaired a number of accreditation teams. Currently she serves as coordinator of the Ford Common Accreditation Data Base Project, sponsored by COPA with the assistance of NCHEMS and funded by the Ford Foundation. Prior to that assignment, she and Dr. Martorana co-directed a FIPSE-funded project on interstate jurisdictional policies as barriers to comprehensive postsecondary planning.

S. V. Martorana has served on accreditation teams in the North Central, Northwest, and Middle States regions, and has assisted state agencies in planning and evaluating higher education in twenty-seven states, Puerto Rico and the Virgin Islands. Prior to his appointment at Penn State he served as vice chancellor for community colleges and provost for vocational and technical education at the State University of New York, and earlier as assistant commissioner for higher education planning for the New York State Board of Regents. Since 1975 he

has annually authored a review of state legislation affecting community, junior, and two-year technical colleges.

Washington, D. C. — Eileen Kuhns

University Park, Pennsylvania — S. V. Martorana

March, 1984

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PART I

BACKGROUND

Chapter 1

INTRODUCTION

Since World War II the purposes of American colleges and universities have noticeably diversified, and in a parallel change, the locations of their educational offerings have also multiplied. While some off-campus programs are within an easy commute of the main campus, others are literally a continent away. In addition, programs sponsored by American postsecondary institutions serve U. S. military bases all over the world, and their study abroad programs provide educational experiences equally dispersed. The monitoring of these off-campus programs, by state higher education agencies and by institutional accrediting organizations, is the central theme of this volume.

State licensure laws provide the usual legal basis for state monitoring requirements. The purpose of a state higher education agency in relation to authorization and licensure is to assure fiscal integrity and at least minimal quality as it relates to consumer protection.

Accreditation has two purposes: to assure the quality of the institution or program, and to assist in its improvement. Institutional accreditation is conducted by bodies that are regional or national in scope, while specialized (programmatic) accreditation focuses on programs preparing students for an occupation or a profession and is conducted by bodies which may be closely related to that field's professional associations (COPA, 1982).

Accreditation is a status granted to an institution or program by a nongovernmental body on the basis of evidence that it meets or exceeds

stated criteria of educational quality, as defined by the overall membership of that body (COPA, 1982). Institutional accreditation is organized around these basic questions: Does an institution have appropriate purposes, and the resources to accomplish them? Is it accomplishing these purposes? Is it reasonable to expect that the institution will continue to accomplish its purposes? A periodic self-study of the institution or program, a site visit by an evaluation team of peers representing the accrediting body, and a review and subsequent decision by the organization's governing group are essential processes for regional, national, and programmatic accrediting bodies (COPA, 1982).

Postsecondary institutions authorized to operate in the fifty states, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Trust Territory of the Pacific may voluntarily seek institutional accreditation through one of six regional accrediting associations, or through one of four national accrediting bodies. The six regional associations conduct accreditation activities through a total of nine postsecondary accrediting commissions. The four national groups accredit institutions across the country specializing in Bible, business, home study, or trade and technical fields.

Origin of the Present Study

Questions raised by one of the regional accrediting commissions provided the initial impetus for this study of the monitoring requirements for off-campus programs. What began in 1980 as an inquiry about that region's requirements expanded within a year to a study of the monitoring required in all six accrediting regions. In addition, the focus broadened to regional requirements for overseas and military

base programs as well. A year later the inquiry expanded again to encompass the monitoring requirements of the fifty states (and certain other areas such as the District of Columbia), and the four national accrediting associations.

Accrediting bodies and later the states were contacted directly to obtain information about monitoring requirements. The letters and documents acquired from these sources were the basis of the narratives appearing in Part II of this volume. The narratives summarize the monitoring requirements for off-campus, military base, and study abroad programs. Each narrative has been confirmed or amended by a representative from the appropriate body, namely the nine regional, or four national accrediting groups, or the state offices responsible for postsecondary education.

The primary task of this project has been to prepare a current and accurate description of these requirements. Interest in quality control of off-campus education is widespread, however; as a result, continuing change in requirements may be expected.

The initial sponsor for this undertaking was the Commission on Higher Education of the Middle States Association of Colleges and Schools. Later sponsors included the institutions with which the co-authors are affiliated (The Catholic University of America and The Pennsylvania State University), and the Council on Postsecondary Accreditation (COPA).

COPA is a voluntary organization of institutional and specialized accrediting bodies and national postsecondary organizations. It was founded following the merger of the Federation of Regional Accrediting Commissions on Higher Education (FRACHE) and the National Commission on Accrediting (NCA) (see Harcleroad, 1980; Chambers, 1983; and

Millard, 1983b). Background factors leading to the emergence of COPA in 1975 constitute the recent history of accreditation in America.

> With the increasing prominence of accreditation and with the federal government's use after 1952 of accreditation as a condition of eligibility for federal funds, the need for developing a single coordinating and recognizing body for accrediting associations became insistently clear. (Millard, 1983b, p. 11)

COPA's major objectives include (1) recognizing accrediting associations that accredit postsecondary institutions and programs; (2) providing national leadership and understanding for accreditation; and (3) providing services to the accrediting associations, postsecondary institutions, and the public (COPA, 1983a, p. 4).

PURPOSES SERVED BY OFF-CAMPUS PROGRAMS

A most acceptable reason for the establishment of an off-campus program is the provision of high quality service to an unserved or underserved group of citizens who find it difficult or impossible to secure instruction at the main campus. Two conditions are often stipulated: that the program not be a drain on parent campus resources, and that it be within the institutional mission.

Operating within the stated mission is important to both the accrediting organization and the state, but for somewhat different reasons. From the standpoint of the accrediting body, the mission is the most basic standard against which an institution's performance may be measured. This is also true from the perspective of the state. In addition, however, the mission may reflect the institution's specific role in the state's coordinated and articulated system of public postsecondary education. Fielding a program which is not within its assigned mission, therefore, may upset the balance projected by the

state's overall plan.

Other less acceptable reasons may actually motivate campus decision makers to establish off-campus programs, for example, lower cost per student credit hour, because of less expensive faculty or less adequate student services, facilities or learning resources. In addition, involvement of main campus faculty may be minimal in decisions about curriculum, admissions, and faculty selection and retention. Certain off-campus courses may or may not be creditable toward main campus majors, and financial aid may be less available to these students. Also, the question of wasteful duplication may be raised for those schools which begin programs in close proximity to similar offerings in other colleges, especially if the newcomer institution's program is publicly funded. Colleges which take programs across the country, especially to urban centers replete with local institutions and similar programs, may be hard pressed to justify such locations. For some institutions these distant centers have helped to support the parent campus, lending credence to the accusation that they are more concerned with fiscal return than with academic performance.

From the standpoint of the student, obtaining an education equal to that available at the main campus, but at a more convenient location and possibly at a lower cost, is a customary reason for attending an off-campus program. By and large, quality is important to students, whether on the main campus or away from it. There are others, however, who are able to garner salary increases or promotions simply on the basis of accruing a stipulated number of credit hours. Some individuals in this situation may prefer an "easy" course, because it takes less time and effort on their

part. Registrations for courses of questionable quality would not continue were there no demand for them, although this demand may run counter to consumer protection efforts on the part of accrediting bodies and the states.

In discussing nontraditional education, Louis W. Bender (1983) makes the point that "there is very little in the way of traditional postsecondary education any more" (p. 285). Rare is the institution that serves only full-time students under 25 and limits their educational fare to on-campus lectures and laboratories leading to degrees.

> Almost all colleges and universities now enroll part-time students and students over twenty-five, offer instruction off-campus as well as on campus and at a wide variety of times, and make use of new technology (from satellites to computers). Many also give credit for experiential learning, offer opportunities for independent study, grant external degrees, and teach noncredit as well as credit courses....
>
> State agencies have been struggling to keep up with the rapid spread of new institutions, programs, and delivery systems. (p. 285)

Nontraditional education is here to stay. In fact, with the educational marriage of computers and various modes of distance learning, its proportion in the total set of registrations for postsecondary education may increase substantially. The growth of off-campus program monitoring reported in this volume is testimony to the increasing importance of this mode of nontraditional education, although it also may be related to questionable motivations on the part of either institutions or students.

OFF-CAMPUS PROGRAM OVERSIGHT

Kaplin (1975) uses the term "triad" to describe the roles of the accrediting bodies, the states, and the federal government in the

governance of postsecondary education.

> (Kaplin's) "triad" concept describes three operations: first, states "charter" or license and in some cases "accredit" institutions; second, accrediting associations admit to membership, and thus "accredit," most institutions that provide programs of acceptable educational quality; third, the federal government, through its taxing and spending power, provides funds to postsecondary institutions and students on the basis of institutional "eligibility" derived from "listing" approved, non-governmental, voluntary accrediting associations. (Harcleroad, 1980, p. 19)

Until the present study, the relative roles of these three entities and of institutions in the oversight of off-campus programs had not been examined in a comprehensive way. Here we examine the roles of the first two entities. The primary focus is on off-campus programs; in some instances, however, it has been necessary to concentrate on the institution per se in order to provide a context for discussing particular issues.

As colleges and universities sensed the impending decline in traditional applicant pools, the increase in off-campus programs was one result of their search for new markets. Interstate issues such as protection of local consumers and local institutions began to emerge, in addition to in-state issues related to institutional mission, statewide planning, financing, and program duplication. Some schools spread their off-campus offerings across their own or neighboring states, while others did the same across the nation (Mingle, 1978). State legislation was one reaction to this phenomenon. This reaction was hastened by the appearance of published accounts about programs of questionable quality, and about those providing undue competition with local institutions.

Some years ago the states began to adopt legislation to license degree-granting institutions, in contrast with their historic role

in chartering such schools (Mingle, 1978). The licensing statutes have involved the states in establishing minimum standards and in evaluating institutional quality, "a new and difficult role for many states" (Mingle, 1978, p. 1). To assist states in these efforts, in 1973 the Education Commission of the States issued model licensing legislation. At that time seventeen states had licensing laws for degree-granting institutions (Bender, 1983, p. 281). Some states specifically reference this model legislation in their licensure laws.

The states' expanding role in institutional oversight is reflected in several publications. For example, Richard M. Millard, now president of COPA, said in 1980, when he was with the Education Commission of the States, that the number of state agencies concerned with postsecondary education had "almost literally exploded" (quoted in Bender, 1983, p. 277). Bender reported that "virtually all states" (p. 277) now have state coordinating or governing boards, and that by 1982 forty-one states had state authorization or licensing agencies for degree-granting institutions, while forty-eight states plus the District of Columbia had this type of agency for proprietary or non-degree-granting institutions. In 1980 Harcleroad (citing Birch, 1979) reported that a state agency had the power to "accredit" institutions and programs in seventeen states. A year earlier, Robert J. Barak published data showing that forty-one states conducted program approvals for new programs, while fourteen states conducted such approvals for existing programs (1979, pp.2-3).

Statutes in many states exempt the programs of whole categories of out-of-state institutions from state agency review, for example, the category of colleges which are regionally accredited (Bender, 1983, pp. 281-282). Laws in other states subject them to all require-

ments placed on in-state parent institutions planning to open a new college. Some states go further, and may subject out-of-state programs to an extraordinary test of "need," requiring evidence that the "need" cannot be met by an in-state institution. On such grounds a state may be successful in keeping out a particular program, but the group of citizens desiring such an offering at a convenient off-campus location may still not be served by the local institution which originally objected to the out-of-state competition. Such state actions, however, may constitute restraint of trade. Catholic University law professor William Kaplin argues that:

> The commerce clause limits the authority of states to regulate in ways which interfere with the free movement of goods and services across state lines. Precedents exist...for consideration of educational activities under the definition of commerce....Often, the courts have required legitimate local public interest, not protection of the economy of a community, as a criterion for decisions in favor of regulation. (Mingle, 1978, p.5)

Institutions traditionally have been responsible for their own programs, wherever they may be offered. This is a general principle underlying off-campus monitoring requirements of accrediting organizations. Publications, conferences, and workshops sponsored by the several accrediting bodies are designed to assist schools in assessing and improving institutional and program quality (Kells, 1981, 1983; Kirkwood, 1978).

Institutional self-regulation may be viewed as one alternative to state oversight, as this statement illustrates: "If colleges and universities are to be relieved of the spectre of intervention by the state, they must strengthen their own evaluation activities" (Marcus, Leone, and Goldberg, 1982, p.31, citing Smith, 1980). Making public

the results of such evaluations, and accepting responsibility for achievement of state objectives, as well as institutional objectives, were other institutional alternatives to state activity discussed by this trio of New Jersey State Department of Education professionals.

A major thrust of their volume was that "accreditation as an indicator of quality has come under strong criticism" (p.2). Examples included these assertions: (1) that accrediting associations assess an institution's quality in terms of its own mission rather than against external standards; (2) that denial of accreditation is "virtually impossible" (p.2) because visiting teams are composed of persons from other institutions within the same region; (3) that accreditation is granted to an institution for as long as ten years, ostensibly without attention from the accrediting body during this lengthy period; (4) that there is secrecy associated with the visiting team's report; and (5) that accrediting organizations do not monitor an institution's quality following accreditation, nor make public any problem areas. In some contrast with the critical emphasis of the New Jersey authors, two professionals from the California Postsecondary Education Commission stressed the assistance given state agencies by accrediting bodies.

> Without question, each state is accountable for the quality of its postsecondary educational program. Generally, however, most states have either delegated this responsibility to nongovernmental accrediting agencies or chosen not to exercise their full authority in this area. (Stevens and Hamlett, 1983, p. 29)

A 1982 report on academic governance from the Carnegie Foundation for the Advancement of Teaching recognized regional accreditation as a critically important part of that governance, but lamented

that it "has increasingly lost significance at the very time it is needed most" (p. 76). In this report, entitled The Control of the Campus, the foundation stated that this "erosion of regional accrediting authority and prestige leaves a dangerous void. The integrity of higher education urgently requires that regional accrediting be supported and that its procedures be improved" (p. 77). Looking toward achieving this objective, the foundation made several recommendations, for example, (1) that regional bodies hold colleges accountable for good management, affirmative action and consumer protection, as well as for academic quality; (2) that regional associations use external standards of quality rather than relying on assessment of a college against its own goals, and (3) that results of each campus evaluation (but not confidential personnel information) be available to the public. A response to this report, entitled "A Critique of Sections on Accreditation in The Control of the Campus" was provided by Bruce Dearing (1983), then chairman of the Middle States Commission on Higher Education.

Those familiar with nongovernmental accreditation may be troubled by some of these views, believing that they either distort reality (as, for example, the assertion that the accrediting body gives no attention to educational quality at an institution except during the self study/team visit portion of the accreditation cycle), or that they impugn good practice (as, for example, the assertion that an institution's own mission and goals constitute an inappropriate basis for assessing quality).

Publicly stated criticisms of nongovernmental accreditation are relevant to this discussion of off-campus monitoring requirements because such assertions, whether true or false, may influence legis-

lative decisions about the balance of responsibility for the quality of such programs. Comments pertinent to these issues may be found in The Balance Wheel for Accreditation (COPA, 1983a); Understanding Accreditation (Young, Chambers and Kells, 1983a); and in Meeting the New Demand for Standards (Warren, 1983), as well as in many of the other references listed at the end of this volume.

A central issue raised by critics of accreditation is the way in which quality is defined. Dependence on standards external to the institution was the practice in accreditation until the North Central Association adopted a new principle of accrediting, "less objective in nature and based on judging an institution in terms of its purposes and its total pattern as an institution" (Harcleroad, 1980, p. 5). The earliest accreditation standards are described by Millard as "definitional-prescriptive."

> They were quantitatively reportable institutional characteristics that defined what a "good" institution was. In most areas, these characteristics were input factors, and the implicit norm was what the "best" institutions did, how the "best" institutions were organized, and what the "best" institutions offered....
>
> The major break in the definitional-prescriptive approach, led by the North Central Association, came in the 1930s. (1983b, p. 12)

Other regionals adopted this approach, making it possible to consider accreditation for institutions with increasingly diverse missions.

Millard clearly does not agree with those who suggest that accrediting bodies should reinstate what he terms "definitional-prescriptive" standards.

> The conception of quality as it relates to process and results has major implications for the nature of the standards that accrediting associations use. Clearly, it means that definitional-prescriptive standards have

> outgrown their usefulness and that they have little to do with determining educational quality. To the extent that they persist, they do a disservice to institutions, students, and the public. Fixed characteristics do not take into account differences in function and changing processes to achieve sound educational objectives.
>
> Standards must relate to accomplishment of educational objectives, goals, and missions. Their functions are to formulate the factors conducive to and indicative of goal accomplishment. In this sense, they translate indexes of goal accomplishment into characteristics statements relevant to mission accomplishment. (1983b, p. 25)

Another approach to academic quality comes from those who advocate applying the economic concept of "value-added" to education (see Astin, 1982). The value-added concept deemphasizes resources or input as quality criteria, but also challenges the relatively new emphasis on "outcomes" per se as a crucial test of academic quality. That is, the value-added approach takes into account the entering as well as the exiting competences of the students served.

Regardless of the criteria used to assess the quality of off-campus programs, whether the public has the right to such information from either the institution or the nongovernmental accreditation agency is still a controversial issue. Legislatures and state agencies (particularly in jurisdictions like New Jersey with "sunshine laws") are trying to weigh the advantages and disadvantages of requiring in-state and/or out-of-state public and/or private institutions to disclose such information about institutional and program quality. (See Bender, 1983; and correspondence dated November 7, 1983 from New Jersey Attorney General Irwin I. Kimmelman to T. Edward Hollander, Chancellor of the New Jersey Department of Higher Education.) A COPA committee is also exploring these questions about disclosure and confidentiality.

COPA's attention to off-campus education began soon after its

founding in 1975. In 1976 COPA issued a policy statement on off-campus degree programs, and under its sponsorship an extensive study of nontraditional education, funded by the Kellogg Foundation, was completed two years later (Andrews, 1978). Nationally known researchers and accreditation professionals associated with this study (for example, Grover J. Andrews, John Harris, Philip N. McCullough, Kay J. Andersen, and Paul L. Dressel) concluded that the purposes, processes and outcomes of nontraditional education are sufficiently similar to those of traditional education to justify similar evaluation procedures for the accreditation of both approaches to postsecondary education.

In 1983 COPA issued an updated "Policy Statement on Off-Campus Credit Programs." This policy statement addresses educational courses, programs, or activities provided in off-campus locations by accredited institutions which lead to a certificate, diploma, degree or other formal credential. It recognizes the institution's responsibility for its programs, but extends that responsibility to include the nongovernmental accrediting association(s). It also suggests attention to minimal standards.

> An accredited institution and its accrediting association(s) share the responsibility for the assurance of quality of all credit programs within the association's scope, regardless of location and collaborative sponsorship (i.e. military, business and industry, professions, government, private enterprise)....A primary concern is the need to provide reasonable assurance that such programs offered by accredited institutions meet or exceed minimal standards and reflect the quality of the sponsoring institution as a whole. (COPA, 1983c, p. 1)

As new demands have been made on accrediting bodies, they have engaged in systematic efforts to meet these challenges. For example, accrediting bodies regularly review and revise their standards and

publications which provide guidance for institutions throughout the accreditation cycle. They arrange training sessions for visiting team members and chairs so that they will be prepared to carry out their important roles in accomplishing both major purposes of accreditation: to assure the quality of institutions and programs, and to assist in their improvement. In addition to scheduling training for new team members, the associations also arrange refresher sessions for those who have not participated in a visit recently. Accrediting organizations have led the way in encouraging responsible innovations, and have urged institutions to focus on educational outcomes as well as on the resources available to achieve them. They have also added public members to their commissions and committees in order to foster public awareness of their principles and procedures, as well as to profit from the viewpoints of these representatives of the general citizenry.

OTHER MONITORING INTERESTS

The roles of three entities interested in or responsible for the quality control of off-campus programs have been noted: the parent institutions, the institutional accrediting agencies (regional or national), and the states. Two other entities which could be involved will be discussed briefly: the specialized accrediting agencies, and the federal government.

Specialized agencies recognized by COPA currently number thirty-seven (COPA, 1983a). They accredit programs ranging from business administration to rabbinical and Talmudic vocations.

Given the structure of these programs, the accrediting agency's concern is seldom with the quality of a program taken off-campus, but rather tends to be with requirements for specific portions of the educational experience which routinely occur at a location away from the main campus.

> Over half of these fields have monitoring requirements for a particular kind of non-classroom education, that which takes place in a clinical or field setting. These requirements tend to be site-related, specifying, for example, a site with adequate facilities, or with a sufficiently diversified group of patients. (Kuhns, 1983)

Nevertheless, at its March 1983 meeting, COPA's Assembly of National Postsecondary Educational Organizations (ANPEO) requested that the COPA Task Force on Off-Campus Programs "consider whether specialized accrediting agencies should be permitted to exclude off-campus degree programs when a similar program offered on campus holds specialized accreditation" (COPA, 1983b, p.2). When COPA's Board adopted a policy statement on off-campus credit programs a month later, it contained this principle:

> A specialized accrediting body, through prior agreement with the institution and in accord with the scope of its COPA recognition, will evaluate all components of an educational program, wherever located. (COPA, 1983c, p.2)

Since this principle has been in effect only a short time, however, and since few specialized accrediting agencies to date have developed monitoring requirements for off-campus programs as herein defined, these agencies have not been included in the current study.

The final entity to be considered in the monitoring of off-campus programs is the federal government. This potential but unlikely role for the federal government is best understood in the context of accreditation's history. After tracing several distinct periods in

this history, Harcleroad described the federal role:

> The federal aspects of the structure of accreditation derive from governmental "listing" responsibilities: summarizing the states' educational activities and publishing a list (since 1870); and publishing a list (since 1952) of "nationally recognized accrediting agencies and associations that (the Secretary of Education) determines to be a reliable authority as to quality of training offered by an educational institution" (Pub. Law 82-550, Sec. 253, 1952). This "listing" responsibility provides the legal basis for the Secretary of Education, after an extensive review, to "recognize" accrediting associations as one main source of information regarding the eligibility of institutions to participate in federal funding programs (Conway 1979, pp. 158-69; see also Finkin 1978). (Harcleroad, 1980, p.18)

To accomplish this "listing" responsibility, (reflecting a mandate to determine institutional eligibility), the Division of Accreditation and Institutional Eligibility was established in the U. S. Office of Education in 1968. (In the Department of Education it has become the Division of Eligibility and Agency Evaluation (DEAE).) This and other federal agencies, such as the Veterans' Administration and the General Accounting Office, attempted to broaden the scope of accreditation activity (Harcleroad, 1980), which in turn led to a period of uneasy relationships between them and the accrediting community (Young, Chambers, and Kells, 1983). These tensions eased following a restructuring at both COPA and the Department of Education, as indicated by testimony of COPA President Richard M. Millard before a House Subcommittee in February, 1983. His remarks included this statement:

> The Council's (COPA's) functions are broader and differ considerably from the federal recognition process carried out by the Secretary (of Education). The latter is primarily related to determination of institutional and programmatic eligibility for federal funds. I am happy to report that over the last two years the relationship between the Council and the Department of Education, including the Eligibility

> and Agency Evaluation Staff, has been cordial and cooperative.
>
> We strongly believe that non-governmental voluntary accreditation of institutions should continue to be a major condition of institutional eligibility for federal funds....It is important that government involvement be limited to eligibility for federal funds and not be broadened to more extensive oversight of accrediting activities. (Millard, 1983a, p.4)

More directly related to the focus of this study, regulations with respect to eligibility for federal funding of programs occurring on branch campuses have been proposed by the Department of Education's Institutional Eligibility Section. One proposed regulation states that "For a branch campus to qualify as a separately eligible institution, it must satisfy, independently of its main campus, each of the relevant statutory and regulatory provisions defining that type of institution" (October, 1983 correspondence from Leslie W. Ross, Section Chief).

Were a branch campus to qualify as a separately eligible institution, presumably it could also qualify for separate accreditation; as such it would not be an off-campus location as defined in this study. (See Section which follows.) Thus it appears unlikely that the federal government in the foreseeable future will have a direct role in the monitoring of either off-campus or study abroad programs as herein defined. On the other hand, all programs sponsored by civilian institutions at military installations by definition occur away from the parent campus, and at facilities which are under the jurisdiction of the federal government. Any quality control exercised over them, however, would not be germane to the question of whether the federal government monitors "off-campus programs."

In summary, then, monitoring requirements for off-campus, military base and study abroad programs may be expected from the regional

and national accrediting associations, and from many of the states, but not from the federal government nor as yet from most of the specialized agencies. A pro-active role in quality control of their own programs, wherever they may take place, is being urged on institutions, lest this prerogative be assumed by other entities (Carnegie Foundation for the Advancement of Teaching, 1982; Kirkwood, 1978; Marcus, Leone and Goldberg, 1983; Mingle, 1978; Warren, 1983).

STUDY DESIGN

The aim of the present study has been to prepare a current and accurate description of the monitoring requirements for off-campus programs published by the six accrediting regions, the fifty states and the four national accrediting associations. Since the similarities and differences in the monitoring requirements of these entities had not received comprehensive treatment until this time, the initial tasks in this study included (1) defining types of "off-campus" programs, (2) developing a conceptual plan for analyzing monitoring requirements with regard to location of instruction vis-a-vis location of parent institution, and (3) identifying major and minor concerns which are the focus of monitoring requirements.

Types of "Off-Campus" Programs

Three types of "off-campus" programs have received attention here: generic "off-campus" programs, educational offerings on U. S. military bases, and study abroad programs. These distinctions were made in order to highlight monitoring issues and concerns unique to each type of "off-campus" program. The following definitions of each program type were employed in this study.

Generic "off-campus" program. This was defined to include instruction which occurs (1) at an "auxiliary campus" not yet separately accredited; (2) at a "center" where courses leading to a degree without attendance at a main campus are offered, but only limited student support services are provided; or (3) at a "site" where courses but no degree granting program is offered, and limited or no student services are provided.

Military base programs. These programs have been defined as those with credit courses provided for military personnel at military sites by accredited and candidate postsecondary institutions. Over a million students were enrolled in 1982 in voluntary nonmilitary education conducted on military bases (Brown, 1982). These sites are under the jurisdiction of the federal government rather than the states, although the latter may become involved if other than military persons and their dependents are permitted to enroll. It is not unusual to find postsecondary institutions from more than one accrediting region and from several states offering programs at one military installation. A base-wide review of such programs has been suggested, rather than one confined to the offerings of a single institution or those of schools from one accrediting region (Brown, 1982; Millard, 1983c). On a pilot basis, the Navy has now approved base-wide review, which will take place in 1984 at selected sites. Discussions about the quality of on-base offerings were instrumental in the development of monitoring requirements for various types of off-campus programs (see Bailey, 1979; and Spikes, 1983).

Study abroad programs. These were defined as travel-study educational experiences in a foreign country conducted by accredited and candidate institutions. Like the rest of American higher educa-

tion, these programs have diversified and in so doing have become more attractive and available to a wider clientele (Matson and Kirkwood, 1983). As is the case with military base programs, a number of colleges, at times involving more than one accrediting organization, may sponsor programs in a single geographic area, or in cooperation with a single host site such as a large European university. In addition to the accrediting bodies, some states have specific guidelines for study abroad programs, but these tend to be cautions about the use of state funds for such purposes.

Monitoring requirements were examined for all three types of programs: generic off-campus, military base, and study abroad. "Types of programs" thus became the first framework for analyzing monitoring requirements published by the regional and national accrediting organizations and by the states. By definition, such requirements for separately accredited branch campuses were not included in this study.

Location of Instruction Relative to Location of Parent Institution

Location of instruction vis-a-vis location of the parent institution is a crucial framework within which to examine monitoring requirements of off-campus programs. Although many such offerings are scheduled within the parent institution's own region and state, some off-campus education takes place well beyond the borders of the school's state, and even beyond those of its accrediting region. Whether monitoring requirements for offerings of these <u>in-region</u> or <u>in-state</u> institutions differ according to the "near or distant" location of their off-campus programs is one question addressed by this study. An equally important question is whether states and accrediting bodies prescribe guidelines for programs which are offered <u>within</u>

their jurisdictional boundaries, but by out-of-state or out-of-region parent institutions.

In order to answer these questions it was necessary to create an analytic framework which simultaneously displays the location of a parent institution (within or outside of the state/region under consideration) and the location of the academic program (either within or outside of the state/region). A 2x2 matrix (see Figure 1) provides a useful illustration of the four possible relationships between the location of the parent institution and the location of a program.

To form the matrix, the regional (or state) location of the parent institution was placed on the vertical axis and the regional (or state) location of the program was placed on the horizontal axis. The parent institution may be within the region (or state) under study at the moment, or outside of the region (or state). Likewise, the instructional program may take place within the region (or state), or beyond its borders. For purposes of this project, the term "quadrant" was used as a kind of code for these four types of relationships between location of institution and location of off-campus program.

In this document, "Quadrant A - BOTH IN" is used when both institution and program are within the same region (or state); "Quadrant B - INST IN" when only the institution is within the region (or state); "Quadrant C - PROG IN" when only the program is within the region (or state); and Quadrant D - when neither the institution nor the program is within the region (or state).

The concept applies equally to locations within or outside of the accrediting region, and within or outside of the state. Obviously, such a conceptual framework is not appropriate for the national accrediting organizations, since all locations across the country by defini-

Definition of **QUADRANTS** as Used in This Study

The framework employed in this analysis looks at the location of the parent institution within or outside of the state or region under consideration, and the location of the academic program which occurs "beyond the main campus," either within or outside of the state/region. A 2x2 matrix helps to conceptualize this framework, with the location of the off-campus program on the horizontal axis. The quadrants illustrate the four possible relationships between the location of the parent institution and the location of the program. **Figure 1** represents these inter- intra- state/regional relationships.

PROGRAM LOCATION

PARENT INSTITUTION LOCATION	WITHIN THE STATE/REGION	OUTSIDE THE STATE/REGION
WITHIN THE STATE/REGION	Quadrant A—BOTH IN Both parent institution and academic program are located within the state/region	Quadrant B—INST IN Parent institution is within the academic state/region, but academic program occurs outside of the state/region
OUTSIDE THE STATE/REGION	Quadrant C—PROG IN Program is located within the state/region; parent institution is outside of the state/region, and thus is under the jurisdiction of another state/regional agency	Quadrant D Both parent institution and academic program are located outside of the state/region under consideration, and thus are *excluded* from this study

Figure 1. Framework for Analysis: location of the parent institution within or outside of the region under consideration, vis-a-vis the location of an academic program which is offered away from the main campus

Hypothetical Examples Illustrating the **QUADRANT** Concept

Figures 2–4 provide hypothetical examples which illustrate the usefulness of the 2x2 matrix for understanding the intra- inter-state/regional relationships between the location of the parent institution vis-a-vis the location of an academic program offered away from the main campus. Moreover, these examples illustrate how the interpretation of these relationships changes from the standpoint of one state/region to that of another. The examples describe intra- and inter-*regional* relationships, but the concept applies equally to intra- and inter-*state* relationships.

Figure 2 illustrates the relationships described in Figure 1 from the standpoint of one of the six accrediting regions (Middle States).

A more detailed example of this analytic framework appears in **Figure 3**, using real institutions but fictional programs. The parent institutions are The Catholic University of America (CUA), a Middle States Association member, and The University of Southern California (USC), a Western Association member. Like Figure 2, this exhibit is from the viewpoint of the Middle States region. **Figure 4** provides the same kind of information, but this time from the viewpoint of the Western region.

Figures 3–4 also illustrate the types of programs offered. Off-campus and military base programs are found in each of the four quadrants (Quadrant A—BOTH IN; Quadrant B—INST IN; Quadrant C—PROG IN; and Quadrant D). Study abroad appears only in Quadrant B—INST IN, where it is included by virtue of the quadrant's definition (i.e., the parent institution is within the region, but the program takes place outside of the region).

		PROGRAM LOCATION	
		WITHIN THE STATE/REGION	OUTSIDE THE STATE/REGION
PARENT INSTITUTION LOCATION	WITHIN THE STATE/REGION	Quadrant A—BOTH IN Both parent institution and academic program are located within the Middle States region	Quadrant B—INST IN Parent institution is from within Middle States region, but program is offered outside of that region
	OUTSIDE THE STATE/REGION	Quadrant C—PROG IN Program takes place within the Middle States region, but parent school is from another region	Quadrant D Both parent institution and academic program are located outside of the Middle States region, and thus are of no direct concern to Middle States

Figure 2. Illustration of the format shown in Figure 1, translated into an example from the viewpoint of the Middle States region.

PARENT INSTITUTION LOCATION	PROGRAM LOCATION: WITHIN THE STATE/REGION	PROGRAM LOCATION: OUTSIDE THE STATE/REGION
	Quadrant A—BOTH IN	Quadrant B—INST IN
WITHIN THE STATE/REGION	CUA offers programs: (1) off-campus in D.C. (2) on a military base in Maryland	CUA offers programs: (1) off-campus in San Francisco (2) on a military base in California (3) in France
	Quadrant C—PROG IN	Quadrant D
OUTSIDE THE STATE/REGION	USC offers programs: (1) off-campus in D.C. (2) on a military base in Maryland	USC offers programs: (1) off-campus in San Francisco (2) on a military base in California

Figure 3. From the viewpoint of the Middle States region, an example of the relationship between location of the parent institution and the academic program, using real institutions, i.e., Catholic University (CUA) and the University of Southern California (USC), but fictional programs and their locations.

PARENT INSTITUTION LOCATION	PROGRAM LOCATION: WITHIN THE STATE/REGION	PROGRAM LOCATION: OUTSIDE THE STATE/REGION
	Quadrant A—BOTH IN	Quadrant B—INST IN
WITHIN THE STATE/REGION	USC offers programs: (1) off-campus in San Francisco (2) on a military base in California	USC offers programs: (1) off-campus in D.C. (2) on a military base in Maryland (3) in France
	Quadrant C—PROG IN	Quadrant D
OUTSIDE THE STATE/REGION	CUA offers programs: (1) off-campus in San Francisco (2) on a military base in California	CUA offers programs: (1) off-campus in D.C. (2) on a military base in Maryland

Figure 4. Same type of information presented in Figure 3, from the standpoint of the Western region.

tion are "within" the accrediting jurisdiction.

This locational matrix constitutes the second framework for analysis of accrediting body and state monitoring requirements. For an illustration of the use of this matrix, see Figures 2-4.

Major Areas of Concern

A review of accrediting commission documents resulted in the identification of four major categories of monitoring concerns: (1) authority and need for the program, (2) academic aspects, (3) administrative aspects, and (4) ancillary or support aspects. Each of these major categories was then subdivided for more specificity. These areas of concern constitute a third framework for analysis of the monitoring requirements.

THE BASIC QUESTIONS

As described above, the monitoring requirements for the states and for the regional and national accrediting commissions have been analyzed according to three analytical frameworks: (1) type of program; (2) location of instruction relative to location of parent institution, (as noted earlier, this analysis is inappropriate for national accrediting agencies' requirements); and (3) major areas of concern.

As the documents were analyzed, six basic questions about off-campus monitoring requirements were kept in focus. These inquiries were also used to organize the findings of the study, which appear in Chapter 9. These questions follow.

What are the differences and similarities in monitoring requirements--

1. among the nine regional and the four national accrediting organizations?

2. between the accrediting groups and the states? More specifically, what is the overlap or duplication in monitoring requirements, and what are the consequences?

3. between the regional commission (or commissions in three of the six regions) and the states comprising that region?

4. among the three types of programs: generic off-campus, military base and study abroad?

5. for instructional locations outside of the parent institution's region (or state) as compared with those for instructional locations inside of the region (or state)? More specifically, are the monitoring requirements more stringent for off-campus programs sponsored by out-of-state institutions?

6. in each of the major categories of concern (authority and need, academic, administrative, and ancillary aspects), for both the states and the accrediting groups?

ORGANIZATION OF THE VOLUME

This volume is organized into three parts. Part I contains this introductory chapter. Part II contains narratives describing the actual monitoring requirements for the accrediting regions and the states. Part III summarizes findings related to the questions posed in this Introduction, and discusses implications for the postsecondary community.

Within Part II is a separate chapter for each of the six regions. First, an overview of the monitoring requirements for the region and the states within the region is presented. Next, narratives for requirements of the accrediting bodies and each of the states within

that region are provided. The narratives for requirements of the four national associations appear in the last chapter of Part II.

Part III begins with a chapter summarizing the findings organized around the six questions related to the design of the study. It concludes with a chapter discussing these findings and their implications for the institutions, their accrediting organizations, the states, and the citizens who are the direct and indirect consumers of American postsecondary education.

The literature on off-campus education is expanding steadily. Scholarly attention is beginning to follow the controversy surrounding issues of quality control and the appropriate roles of those accountable for it: the institutions, the accrediting associations, and the states. The bibliography includes not only the citations for this volume, but also a selection of other references for related information.

PART II

MONITORING REQUIREMENTS

NOTE FOR PART II

Narrative descriptions of the monitoring requirements for the six accrediting regions and their constituent states comprise the chapters in Part II. These narratives are based on materials sent to the Project office by accrediting bodies and state postsecondary agencies. The narratives have been confirmed (or amended) by representatives of those organizations.

The chapter for each region begins with a preface; the preface provides a general overview of the monitoring requirements of the regional accrediting bodies and the states in that region. The chapters are arranged according to the alphabetic order of the regional accrediting associations; the states within each chapter are also presented alphabetically. The final chapter outlines the requirements of the four national associations.

Among the states and the regions there was dissimilarity as to whether they stipulated monitoring requirements specific to off-campus, military base, and study abroad programs. Consequently, there is some variation in the way each chapter is organized.

Chapter 2

MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS AND THE STATES AND OTHER JURISDICTIONS WITHIN THE REGION

Overview

The geographic area over which the Middle States Association has accrediting responsibility includes Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the Virgin Islands.

This Association's Commission on Higher Education has monitoring requirements for off-campus, military base, and study abroad programs, and for those offered in Quadrants A - BOTH IN, B - INST IN, or C - PROG IN. Its philosophy and procedures focus on the entire institution, with the parent organization being accountable for all of its programs, wherever they may be offered, and whatever their format. The Commission has made systematic efforts to evaluate the military base and study abroad programs of its member institutions, and in so doing has developed guidelines of value beyond the region as well as within.

The states within the region and Puerto Rico all have monitoring requirements for off-campus programs, most of them quite detailed. In two of the states, regional accreditation suffices to exempt the off-campus program from additional state requirements. All of these jurisdictions monitor programs brought into the state by out-of-state institutions, that is, programs at Quadrant C - PROG IN locations. For the most part these states and Puerto Rico specify monitoring requirements for their own institutions both private and public

(Quadrant A - BOTH IN), but there are some differences and some exemptions. Maryland has an unusual policy with respect to telecommunications: Board of Higher Education policy requires that institutions must restrict television insruction to a radius of 25 miles from the transmitter's source.

In the Virgin Islands legislation to authorize and regulate non-resident postsecondary institutions has been proposed, and the Bill is being reviewed by the Senate.

MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS

COMMISSION ON HIGHER EDUCATION

The Middle States Commission on Higher Education has expressed its position toward off-campus activity in a question which could be directed at every institutional activity: "Is the enterprise consistent with institutional mission, resources, and procedures and with the best traditions of higher education?" To help its institutions respond to this question, the Commission has developed guidelines and procedures for evaluating instructional activities which take place away from the main campus.

Degree-credit programs which are initiated after the institution's most recent evaluation are not automatically included in the parent institution's accreditation; the Commission must take specific action based on stated procedures.

Off-Campus Programs

The institution must notify the Commission about plans for off-campus programs at least ninety days before the activities become operational. In addition, it must submit a statement of the nature and purposes of the activities along with basic planning documents indicating need for the program; legal authorization to conduct it; budget and other information showing adequate financing, governance and administrative organization; provisions for faculty, library and facilities; records of institutional procedures followed in approving the program; copies of any contractual arrangements, and publications announcing or describing the activities.

In evaluating the program, the Commission will consider both its educational nature and its impact on the total institution. An on-site visit may be required; if so, its cost will be borne by the institution. Only after the Commission has determined the program's acceptability may the institution consider the program to be within the scope of its institutional accreditation. At the end of the first semester or year, the institution must either submit a separate report on the new activity to the Commission or include such information in its annual data summary if this comes first. Points to be covered include a review of the purposes and goals of the program as they relate to the institution's mission, and assessments of: achievement of educational objectives, faculty and instructional methods, fiscal and physical resources, curriculum, courses, modes of evaluating and granting credit, and student services, counseling and placement. All of these monitoring requirements are directed at programs offered within the region, and sponsored by institutions within the region (Quadrant A - BOTH IN).

Programs offered outside the Middle States region by parent institutions within the region (Quadrant B - INST IN) may involve a unit that is or is not separately accreditable. The former type will be accredited by the other region's Commission, although communication and interaction between the two Commissions are essential. For the latter type, the Commission in whose area the instructional program is located will be invited to participate in any on-site evaluation that may be conducted by the Middle States Commission. From the point of view of this Commission, the same logic applies when an institution

located outside the Middle States brings a program into the region (Quadrant C - PROG IN); the roles of the two Commissions are simply reversed.

Military Base Programs

The Commission fully endorses the development of educational programs on military bases in cooperation with accredited and candidate institutions. Because of the unique circumstances of the military, institutions should feel free to adapt methods, policies, and procedures in order to accommodate these circumstances, but always within essential quality standards.

The Middle States Commission provides guidelines outlining the responsibilities of institutions and the obligations of the military. As to responsibilities, the programs offered should relate to the purposes of the institution and adhere to its standards; the institution should take into account the unique circumstances of the military; student personnel policies and services should facilitate the success of a military base program; faculty and instruction should be of recognized quality; and institutions seeking contracts to provide such educational services must maintain institutional integrity and guard against the erosion of instructional quality. In turn, the military should not hesitate to initiate negotiations toward providing educational programs on base; should facilitate an early joint meeting of institutional and base leadership; should provide certain essential resources such as suitable and adequate classrooms, space and facilities for a library or learning center, adequate learning resources to support the program, laboratory space and essential equipment for courses requiring laboratory experiments, and other

equipment and supplies essential to the courses offered; should give full support to the program once initiated; and should first provide for the military in terms of space and instructional services. Where nonmilitary personnel are allowed to take classes, the inclusion of community people on a self-paid basis is permitted.

Military base programs conducted by Middle States institutions will be evaluated by the Commission along with their institutional evaluation. If the base is within another accrediting region, the evaluation will be conducted jointly; primary responsibility will be vested in the Commission responsible for the instructional location. Occasionally two or more institutions provide educational services for a military base through a consortial arrangement. The Commission should be so notified. Evaluation of such programs will be conducted in conjunction with the individual institution's own accreditation; such consortia will not be independently evaluated for separate accredited status.

Study Abroad Programs

The Commission has developed an extensive set of guidelines for study abroad programs, and over a three-year period has undertaken the evaluation of study abroad programs conducted by Middle States institutions in Austria, Belgium, England, France, Germany, Israel, Scotland, Italy, and Spain.

The guidelines stipulate that the program be related to the objectives of the institution and provide educational experiences related to its curriculum, have a well-defined rationale, be accurately represented in the catalog and all promotional literature, and be available to students carefully selected in terms of ability

and interest. For programs required by the institution, policy with respect to financial assistance should be carefully articulated, as should language proficiency requirements if appropriate. Adequate, accurate, and honest information should be made available to prospective participants, particularly with respect to the nature and circumstances of the instruction, the program's relationship (if any) to a foreign institution, grading practices, local living conditions, and the program's responsibility for local housing. The guidelines further specify that participants be given extensive orientation before departure and on arrival in a foreign country; that a competent resident director be selected for an appointment period not less than two years; that counseling and supervisory services be available at the foreign center, along with adequate basic reference materials; that criteria for assigning credit be clear and consistent with standards at the home institution; that there be a stipulation noting the usual necessity of prior planning or approval by the student's home campus if credit is to be accepted by that institution; that regular follow-up studies of the individual and institutional benefits of the program be conducted; and that there be assurance of fair reimbursement if the program is not delivered as promised for reasons within the sponsor's control. The Commission does not evaluate commercially sponsored "study-travel programs" as foreign study programs of member institutions.

DELAWARE

Off-Campus Programs

The State Board of Education has the authority to approve institutions of higher education incorporated in Delaware and those non-Delaware institutions offering courses, programs, or degrees within the state. There are no published monitoring requirements for off-campus, military base, or study abroad programs offered by Delaware institutions (Quadrants A - BOTH IN and B - INST IN).

The State Board is responsible for reviewing all applications from out-of-state institutions that wish to offer credit courses or degrees within the state (Quadrant C - PROG IN). A preliminary application must be filed one full academic year before the requested date of implementation, and all supporting documents and final application forms must be filed at least six months in advance.

Institutions fully accredited by their own regional Commissions may have their Delaware programs licensed upon application and payment of the fee, provided the accreditation includes extension, satellite, or other off-campus operations. Whether accredited or not, applications must show that the proposed facility is in compliance with Delaware and local ordinances pertaining to fire, health, zoning, and safety; that degree programs conform to minimum standards for similar institutions operating within the state; and that the out-of-state institution's board of control guarantees to the State Board of Education the financial solvency of operations in Delaware.

Programs may be approved for periods of one to five years, with approval for renewal contingent on favorable recommendations based on

periodic reviews. The institution must inform the State Board of the names and addresses of those responsible for directing the program from the parent campus, the names of instructors, the locations of all Delaware sites, and the names and addresses of enrolled students. All costs incidental to the evaluation and approval of a program or course will be borne by the applicant institution. A license fee is required for each school year of operation. All agents representing out-of-state institutions must make application for an agent's permit, on forms prepared by the Board. Delaware enrollees may not be solicited until the agent has been issued an appropriate identification permit.

DISTRICT OF COLUMBIA

For a number of years the District of Columbia has been developing and refining its regulations with respect to the licensing of private postsecondary institutions. By action of the 89th U.S. Congress, a Board of Higher Education was assigned the responsibilities formerly exercised by the Board of Education. In 1976, by action of the Council of the District of Columbia, these responsibilities were transferred again, this time to the Educational Institution Licensure Commission, which licenses private educational institutions and their agents, unless specifically exempt. Such licensure is prerequisite to operating or offering courses in the District of Columbia.

Licensing regulations address two general areas. Section I is concerned with philosophy of education. Section II specifies descriptive items which must be included in a request to the Commission for licensure: the institution's name; a statement of its educational philosophy; its purposes and objectives; its programs, including a description of ways of reaching the objectives within the educational philosophy; its organization and finances; its board of control and administration, including its nondiscrimination policy; the physical plant, facilities and instructional equipment; a list of the faculty, including their professional preparation, teaching experience, and current assignment, and the institution's policies on appointments and tenure; the instructional methods used, and the process by which student achievement is measured; and the institution's refund policy.

Off-Campus Programs

One of the subsections of these regulations deals specifically with correspondence, extension, and summer session programs; this is the Licensure Act's principal statement about off-campus instruction. All such courses must be consistent with those offered to full-time students. If more than half of the coursework leading to a degree is earned by correspondence or extramural study, the diploma shall so indicate. The institution shall state clearly any differences between the home campus and the off-campus location with respect to offerings, facilities, faculty, and administration.

Institutions seeking initial licensure, whether within or outside of the District of Columbia, must first apply to the Commission for a certificate of name approval. Since 1934 no institution has been permitted to use the words "United States, federal, American, national, or civil service" in its title. An official application includes a resolution from the institution's governing body, and identification of the person authorized to represent the institution during the review process; a written document reporting compliance with Sections I and II (see above); and a set of the institution's publications. After acceptance of a formal application, the Commission appoints a representative and consultants to visit the institution and confer with administrators. A provisional or regular license may be issued, and there is provision for renewal. Unless exempt, institutions must submit catalogs, audited financial reports, president's reports, and similar documents including an annual data survey sheet.

The few regulations for off-campus programs focus on Quadrant A - BOTH IN locations or Quadrant C - PROG IN locations. The Commission's regulations specify institutions under private control.

Military Base and Study Abroad Programs

District of Columbia institutions operating on a military base (Quadrant A - BOTH IN or Quadrant B - INST IN) or fielding a study abroad program (Quadrant B - INST IN) must follow the District's guidelines for programs occurring away from the main campus.

MARYLAND

Several documents published by the State Board for Higher Education provide information about monitoring requirements for programs occurring away from the main campus. Three of these are Code of Maryland regulations: one specifies the minimum requirements for degree-granting four-year colleges and universities; one specifies the minimum requirements for two-year colleges; and one specifies the requirements that out-of-state postsecondary institutions must meet to receive authorization for offering courses and academic programs and awarding degrees in the state of Maryland. The State Board also issues a program proposal manual which includes the required format for proposing an off-campus program and publishes an annual survey of programs operating in the state under the auspices of out-of-state parent institutions.

Off-Campus Programs

Approval to operate and award degrees applies only to the instructional facilities designated in the institution's certificate of approval. Off-campus degree-granting programs must be separately authorized by the State Board for Higher Education. The institution must present evidence demonstrating the educational need for the program, at a minimum showing that the proposed program is not unreasonably duplicative of existing or planned programs in a specific geographic location. A Board policy requires that institutions must restrict television instruction to a radius of twenty-five miles from the transmitter's source.

In addition to demonstrating need, the proposal for an off-campus

program must contain a rationale and objectives for the proposed offering and must give information about: the course of study leading to the proposed degree, including its relation to on-campus work; the students to be served by the proposed program; accreditation; institutional review and approval of the proposal, and plans for evaluation of the ensuing program; staffing qualifications; facilities and equipment; student services; an equal opportunity impact statement; and finances, including resource requirements and program workload projected, with attention to the possible impact these may have on the parent institution. These regulations apply to Quadrant A - BOTH IN locations; that is, to Maryland instructional sites sponsored by Maryland institutions.

Out-of-state institutions may not operate in Maryland without a Certificate of Approval from the Commissioner of Higher Education. Such an institution's application for authorization to offer a postsecondary course or program at a specific location in Maryland (Quadrant C - PROG IN), and all supporting documents, must be received by the Commissioner at least five months before scheduled operation. The application, on a form provided by the Board, must include the specific geographic location; the proposed date of operation; the identification of the institution and its authorized representatives; a Board of Trustees' resolution attesting to financial solvency; a certificate of incorporation as a foreign corporation; regional accreditation status; copies of awards; programmatic data; qualifications of instructors and staff; library resources; certificate of compliance with fire and safety codes; and copies of advertisements. No publicity may be issued until official approval has been granted by the Commissioner.

An approved institution must maintain continuous full accredication by a regional accrediting association. Specialized fields of study maintaining professional accreditation shall meet the same standards applicable to the home campus. With respect to need, an out-of-state institution at a minimum must provide evidence that the proposed program is not unreasonably duplicative of existing or planned educational activities in a specific geographic region, and that it is justified by student interest and present and future employment opportunities.

Academic policies for admission, graduation, and awarding credit must be consistent with those of the parent institution, and with the state's minimum requirements for colleges operating in Maryland. The institution shall provide an on-site staff responsible for the overall administrative operation (including counseling, advising, testing, orientation, financial aid services, and maintenance of academic records) and for meeting the expectations set forth in the above regulations. Competent faculty with appropriate education and experience shall be employed. At least one third of the classes offered must be taught by full-time faculty of the parent institution. Finally, adequate and appropriate library resources must be available within reasonable distance of the instructional site, and statistics on use must be kept to provide evidence about the availability and accessibility of these resources. Contracts providing for library resources may be acceptable if adequate accessibility is assured.

Out-of-state approvals must be renewed on an annual basis.

Military Base Programs

Institutions offering programs on a military base may be exempt from the preceding regulations, provided that they do not enroll non-active-duty military personnel, military dependents, or civilians, and provided that they waive the right to claim veterans' benefits for enrollees.

NEW JERSEY

Off-Campus Programs

According to statistics compiled by the Department of Higher Education, almost 400 public and independent off-campus sites were operating in New Jersey during the academic year 1978-1979. Believing the current regulations to be ambiguous, the Chancellor proposed amendments that defined off-campus instructional sites and approval procedures. In 1982 the Board of Higher Education approved revised regulations regarding petitions from out-of-state institutions. In 1983, following a ruling by the New Jersey Attorney General, the Board approved amendments to state licensing regulations. These amendments specifically apply to all New Jersey higher education institutions, private as well as public. The reasons for these changes are reflected in the Attorney General's correspondence, along with other details pertinent to a discussion of New Jersey's monitoring requirements.

> The proposed regulations reflect the Board's concern that higher educational institutions, when establishing such (off-campus) facilities in the past, have not provided a full range of ancillary services to students enrolled at such locations, thereby depriving them of significant educational benefits....
>
> The proposed regulations would maintain the existing policy of ordinarily accepting Middle States' accreditation for the licensure of the principal campus of a college or university. Off-campus operations, however, would have to meet the separate requirements for licensure set forth in the proposed rules....
>
> The principal part of the proposed regulatory scheme....requires a demonstration, for the purpose of ensuring quality of education, of the adequacy of classroom, laboratory and library facilities...provisions for sufficient administration, support staff and counseling...and evidence of the adequacy of the faculty as well as an acceptable student-faculty ratio....

> The proposed rules also establish a framework for regulating programs in which courses are offered for credit at off-site locations by an institution of higher education in conjunction with or under contract with commercial enterprises. (Correspondence from Irwin I. Kimmelman, Attorney General, to T. Edward Hollander, Chancellor, dated November 7, 1983, pp. 1-2)

Prior approval by the Board of Higher Education is necessary for the establishment of off-campus centers or branches (Quadrant A - BOTH IN). A community college may establish branch campuses to make its programs more readily available, if such a branch is provided for in the college's master plan and if that plan has been approved by the Board of Higher Education. Summer, evening, part-time and extension work is considered part of the institution's total program and is judged by the same criteria used for regular academic year sessions on the main campus.

In seeking approval to establish off-campus centers or branches (Quadrant C - PROG IN), an out-of-state institution must submit a statement justifying the need for such a center, along with information about the steps it is taking to meet the Board's published standards for program approval and licensing of higher education institutions in New Jersey. Specific attention should be given to adequacy of classroom, laboratory, and library facilities; provisions for adequate administration and support staff; and number and qualifications of regularly employed full-time faculty members.

The Board of Higher Education in its coordinating capacity reviews all petitions from out-of-state institutions to offer credit-bearing or degree programs in New Jersey (Quadrant C - PROG IN). Approval of such an offering does not preclude the right of a New Jersey institution to develop a similar program. Requests for approval to offer new programs must be submitted one academic year

before the implementation date, while requests for approval to offer courses require only six months' advance notice. The petition from the institution must respond to a series of questions and other items concerned with: program objectives, program description, faculty, finances, physical facilities, and library. Also to be included are the institution's accreditation status; information equivalent to a regional accrediting association's annual summary sheet; the institution's audited financial statements for the last three years; a description of the instructional site's faculty selection and review process; and a catalog and other exhibit materials such as a copy of incorporation papers and class schedules. Programs may be approved for periods of one to five years.

Military Base Programs

Out-of-state institutions which wish to offer degree programs on military/federal installations and which in addition seek approval for veterans' training (GI Bill) must conform to specified review procedures which are currently in place for all programs/licensure petitions brought before the Board of Higher Education. These procedures involve: review by the Department of Higher Education Veterans Program Office for U.S. Code compliance; review of petition for completeness by the appropriate Department office; review by consultants; Academic Council's and then Chancellor's review and recommendation; and notification of decision by the Veterans Program Office, which is the state approval agency. For New Jersey institutions, only those degree programs which have not been approved by the Board of Higher Education will be reviewed by the procedures specified above.

NEW YORK

Off-Campus Programs

Courses offered anywhere in New York that carry degree or certificate credit must be part of a registered program. This requirement applies to both Quadrant A - BOTH IN and Quadrant C - PROG IN locations; that is, to programs sponsored either by New York or by out-of-state institutions. To be registered, a copy of the curriculum must be submitted to the Commissioner of Education, along with specified information. The curriculum must show evidence of careful planning and must be consistent with the Regents' Statewide Plan for the Development of Postsecondary Education. Curricula offered at a branch campus (Quadrant A - BOTH IN) must be registered separately from curricula at the institution's main campus. Application for re-registration is presumed; no actual renewal application is required from the institution.

Off-campus regulations approved by the Regents in 1980 classify all credit instruction taking place away from the main campus into four categories: (1) extension site or interinstitutional site (no complete programs, 15 or fewer credit courses, and not more than 350 registrations for credit in any academic year); (2) extension center or interinstitutional center (no complete programs, more than 15 courses for credit, or more than 350 course registrations in an academic year; (3) branch campus or interinstitutional program (one or more programs leading to a certificate or degree, and any number of courses and course registrations; and (4) exceptions, such as programs or courses offered outside of New York state (Quadrant B - INST IN),

or on federal territory; clinical or practice sites; courses offered to high school students in high schools; courses offered inside correctional facilities or on Native American reservations, and other exceptions granted by the Commissioner. The term "interinstitutional" in this context refers to the kind of offering described, but it is conducted by one institution on the campus of another degree-granting institution. No separate approval is required for the first and last categories of off-campus instruction. For the second category (extension or interinstitutional center), the Commissioner's approval is required. For the third category (branch campus or interinstitutional program), Regents' approval is required; this involves master plan amendment, charter amendment, or Regents' permission, as appropriate. The principal new feature of the 1980 regulations is that prior approval of the Commissioner is now needed for large off-campus centers offering less than a full program (the second category). Applications for the categories requiring the Commissioner's approval are submitted in the same manner as applications to register a new program or to amend an institutional master plan. Required information includes: data needed to locate and classify the center; academic information about the resources available or accessible to the center's students; and planning information needed to assess the impact of the proposed center on the Regents' statewide goals related to access, effective use of resources, and diversity.

Standards are provided for the registration of undergraduate and graduate curricula, whether at or away from the main campus. These standards are concerned with: resources; faculty; curricula and awards; admissions; administration; and other requirements, such as

adequate support services. Institutions must maintain current records for each instructional location, including the number of courses offered for credit, and the number of credit course registrations.

If a proposed center appears to meet academic quality standards, the State Education Department canvasses other nearby institutions to determine their assessment of the center's likely impact on existing programs and institutions.

Approval of branch campus operations (Quadrant A - BOTH IN) is required for independent and public universities and colleges, and for degree-granting proprietary institutions. The Department has prepared a detailed application form to be used in requesting this approval.

Educational programs in New York operated by out-of-state institutions (Quadrant C - PROG IN) are classified into four categories: (1) those sponsored by institutions not affiliated with New York colleges; (2) those sponsored by institutions affiliated with New York colleges; (3) those operating on territory beyond New York's jurisdiction (such as military installations); and (4) those operated by non-degree granting institutions in New York affiliated with nonaccredited out-of-state institutions. Programs in the first category require the prior consent of the Regents. Out-of-state institutions not affiliated with a New York college must offer evidence (which may take the form of regional or specialized accreditation) that their educational quality and resources are equivalent to those of New York colleges and universities, that the proposed program is needed, and that their long-range plans for the program are consonant with the Statewide Plan for the Development of Postsecondary Education. Specific approval for programs in the second category is not necessary, so long as the New York college with which

the out-of-state institution is affiliated has registered programs at the same level of study and has filed declarations of academic need and responsibility for the program. The State Education Department does not have a direct responsibility for evaluating the quality of or need for programs in the third category. Programs in the fourth category (those operated by New-York-incorporated institutions which themselves are not empowered to confer degrees, in affiliation with nonaccredited out-of-state institutions) may not offer degrees through such an affiliation, either within or outside of New York.

PENNSYLVANIA

Off-Campus Programs

In 1981 the governor of Pennsylvania issued an order that all agencies under his jurisdiction should draft clear and concise regulations, organized in logical sequence, for the purpose of achieving legislative goals effectively and efficiently. In response to this mandate, the Council of Higher Education and the State Board of Education drafted an amended set of regulations governing the operation of higher education in the state. In January 1982 the State Board approved revised chapters in the education code on: General Provisions - Higher Education; Institutional Approval; Program Approval; and Foreign Corporation Standards. These became effective May 1, 1982. Procedures for the approval of new programs are covered, but these guidelines do not mention locations away from the main campus. The off-campus program offered by an in-state institution (Quadrant A - BOTH IN) is addressed in a separate chapter titled: Branch Campuses for State-Supported Institutions. The Branch Campus chapter was amended and became effective July 24, 1982.

The chapter on foreign corporation standards does include guidelines for the approval and operation of programs located in Pennsylvania but sponsored by an out-of-state institution (Quadrant C - PROG IN). These guidelines focus on institutional commitment, governance, curricula, faculty, admissions requirements, and resources and facilities. Examples of specific monitoring requirements include the establishment of an education advisory committee of no fewer than three persons, who are Pennsylvania residents and who are not

employed by the corporation; the annual evaluation of each program by the institution for compliance with institutional objectives; the availability of full- and part-time faculty for academic advisement and interaction with students; admission standards comparable to those at the main campus; library and research resources provided on site or by contract with a Pennsylvania-based entity or both; and appropriate physical facilities and instructional equipment adequate to initiate and maintain the program.

Following initial approval to operate, a certificate of authority is issued by the Pennsylvania Department of State; only at this point may the institution recruit and register students and begin operation. A site visit is conducted by an evaluation committee during the first semester of operation. After their report is submitted and the institution responds, final approval (or disapproval) of the enterprise is rendered by the Secretary of Education. Periodic progress reports are required, and reevaluation occurs every five years. Procedures are also given for withdrawing from such an approved enterprise.

Military Base Programs

Pennsylvania has an informal agreement regarding programs offered at military installations. The Department of Education is consulted before the military contracts with a foreign (that is, out-of-state) corporation.

PUERTO RICO

The Council on Higher Education is authorized to regulate the establishment, operation, and accreditation of private higher education institutions in Puerto Rico which grant certificates, diplomas, degrees, or licenses. The 1976 Act providing this authorization does not allow the granting of a license to schools-without-walls or to correspondence schools. The Office of Licensing and Accreditation of Private Higher Education Institutions was created to establish procedures for implementing these regulations. The Council issues both authorization, and initial and renewal licenses, equivalent to an accreditation, each valid for a four year period and subject to a fee.

Off-Campus Programs

In 1978, the Office of Licensing and Accreditation issued a set of guidelines for the establishment and development of private postsecondary institutions operating in Puerto Rico. One section pertains to "programs outside the institution and of special nature." Such academic programs must follow the objectives of the corresponding institutional level (defined in the above document) and must meet certain requirements with respect to academic and administrative procedures; quality of faculty and teaching; library and other teaching and learning resources; student services; physical facilities; and other matters which guarantee the achievement of the program's objectives. Institutions with an open-admissions policy must give assurance that a high level of academic excellence is maintained;

that the policy includes a diagnostic system and the means to correct deficiencies; that the students' academic achievement is continuously evaluated; and that the findings of such evaluations are used to make necessary changes in the curriculum and other pertinent areas.

To operate new academic units, such as campuses, the institution must ask for prior authorization from the Council. If approved, the Council will grant authorization through an amendment on the license.

Out-of-state (private or public) institutions proposing to bring programs into Puerto Rico by definition must apply for an authorization license. Decisions as to whether the institution complies with norms and minimum requirements will be based on its stated educational philosophy and objectives. Requirements include: definite plans toward the realization of objectives in the short and long term; a properly organized board of control; operative regulations consistent with philosophy and objectives; a defined administrative organization, with teaching staff participating in the development of academic norms; appropriate administrative and faculty preparation and experience; a catalog, which will constitute a contract between the institution and its students; a viability study including an income and expense study for the period required to graduate the first class; an adequate accounting system; an adequate number of professors, including full-time faculty; adequate building and grounds facilities; adequate library collections, personnel, and facilities; publication of minimum admission requirements and rules and norms the students must follow; and observation of publi- liability norms (for example, advertising standards).

With the exception of monitoring requirements for programs sponsored by institutions not domiciled on the island, Puerto Rico has few guidelines for off-campus programs.

Military Base Programs

There are no monitoring requirements for programs offered on military bases. Out-of-state institutions planning to enroll civilian residents of Puerto Rico in any military base program, however, must comply with Puerto Rico's licensing regulations.

VIRGIN ISLANDS

Legislation to authorize and regulate non-resident postsecondary educational institutions currently operating or planning to operate in the Virgin Islands (Quadrant C - PROG IN) has been proposed. The Bill is currently under review by the Senate.

Chapter 3

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES AND THE STATES WITHIN THE REGION

Overview

There are two commissions within this Association: the Commission on Institutions of Higher Education, and the Commission on Vocational, Technical, Career Institutions. The latter recommends accreditation status for non-degree and associate degree-granting institutions that do not offer transfer programs in general education or the liberal arts. States within the region include Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont.

This Association's monitoring requirements for off-campus, military base and study abroad programs are similar to those published by the Middle States Association. The monitoring requirements for Quadrant A - BOTH IN and Quadrant B - INST IN locations are the same; that is, the Association's policies are the same for off-campus programs of New England parent institutions, whether they are offered within or beyond the region. No monitoring requirements were specified for programs brought into New England by out-of-region parent institutions (Quadrant C - PROG IN).

In contrast with the regional association, the New England states concentrate on requirements for out-of-state programs (Quadrant C - PROG IN). In half of the states accreditation is necessary for these off-campus programs, and in two of the other three states accreditation provides a basis for exemption from state monitoring requirements. Four of the six states have rather detailed monitoring

requiremcnts for programs of institutions subject to them. One state is concerned that off-campus work be creditable on the home campus.

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES
COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION
COMMISSION ON VOCATIONAL, TECHNICAL, CAREER INSTITUTIONS

In the New England region an institution achieves accreditation through the Executive Committee of the Association, on recommendation of one of the following four commissions: the Commission on Institutions of Higher Education, the Commission on Independent Schools, the Commission on Public Schools, or the Commission on Vocational, Technical, Career Institutions. The latter recommends accreditation status for non-degree and associate degree-granting institutions that do not offer transfer programs in general education or the liberal arts, while while the Commission on Institutions of Higher Education recommends accreditation status for all other associate degree-granting institutions.

With respect to the monitoring of off-campus and military base programs, the requirements of these two Commissions concerned with associate degree offerings are essentially the same. In turn these requirements closely parallel those reported for the Middle States Association. A few differences may be noted: for example, New England devotes more attention to the need for greater uniformity of policy and practice among the various branches of the military. For the purposes of this presentation, however, New England's monitoring requirements for off-campus, military base, and study abroad programs may be regarded as similar to those reported in the Middle States section; thus they will not be repeated here.

Correspondence from officials of this Association stated that their policy on off-campus programs does not differentiate between

intraregional and interregional locations for offerings sponsored by parent institutions located in New England; that is, the monitoring requirements for Quadrant A - BOTH IN and Quadrant B - INST IN locations are the same. On the other hand, the Commission has no monitoring requirements for Quadrant C - PROG IN locations (i.e., programs offered within the region but sponsored by institutions from other regions).

Both New England Commissions for postsecondary institutions also have policy statements on contractual relationships with non-regionally accredited organizations. Such contractual relationships are germane here to the extent that any educational activities so arranged take place away from the New England institution's main campus. The guidelines of the two Commissions for substantive change are also similar; the definition includes a change which adds one or more new geographic locations for instruction. In such a case the institution must notify the Commission, reporting on the rationale for the program, the faculty, library, facilities, financial resources, strength in supporting fields, admission and degree requirements, number of students involved, and plans for the program's administration. Following experience with the change, it will be evaluated by the Commission. A resulting accreditation action will apply to the institution as a whole, not just to that part of the institution which was changed.

The Association's policy on off-campus educational activities applies to both degree and non-degree programs offered for credit toward a certificate, diploma or associate degree. The policy does not apply to off-campus community service courses, nor to winter term or study abroad programs. The Commission's policy statement makes the

point that it does not require individual reports on every off-campus activity.

CONNECTICUT

Regulations for licensure and accreditation govern both in-state (Quadrant A - BOTH IN) and out-of-state (Quadrant C - PROG IN) institutions offering programs in Connecticut. An institution may not confer a degree unless authorized by act of the General Assembly, and application for such authority must be evaluated and approved by the Board of Governors for Higher Education. The granting of a new license is usually contingent on an evaluative report from competent educators approved by the Board. Alternatively, the Board may accept regional or national accreditation if it receives satisfactory evidence of the overall competence and resources of the applying institution. Criteria used for evaluation include information about purpose and objectives; administration; finance; faculty; curricula and instruction; resource centers and libraries; admission, student personnel, and graduation policies; student and alumni records; physical plant and facilities; and catalogs and publications, including advertising.

Off-Campus Programs

Connecticut institutions proposing substantive changes must report such changes to the Commissioner of Higher Education. The regulations for licensure and accreditation explicitly provide that summer sessions and extension (evening and off-campus) courses shall be considered as part of the total program of the institution, to be judged by the same criteria as the sessions and courses offered by the institution during the academic year. Since 1980, all new program

approvals have been site specific. Expansion of such programs to new locations will require separate approval.

Out-of-state institutions planning to establish branches or to offer instruction in Connecticut (Quadrant C - PROG IN) must apply to the Commissioner for an evaluation of their plans. To be eligible for this evaluation, the institution must have official approval to operate in its home state, as well as regional accreditation. Eligible out-of-state institutions may be approved for in-state operation without formal on-site evaluation if the intended scope of the program is minimal. If this is not the case, or if certain other conditions with respect to regional accreditation pertain, an evaluation of plans for each branch or program is required. The procedures are those applicable to in-state institutions; if the plans are approved, the institution is also licensed in the same manner.

MAINE

Off-Campus Programs

This state publishes no monitoring requirements for the off-campus offerings of its own institutions (Quadrant A - BOTH IN). To confer degrees within the state (Quadrant C - PROG IN), an out-of-state educational institution must obtain legislative authorization or exempt-institution status by applying to the State Board of Education on forms prepared by the Board. In 1981 a law was passed amending an earlier act related to authorization of degree-granting authority for higher education institutions. Exempt from the provisions of the 1981 act are those out-of-state higher education institutions given specific degree-granting authority by the legislature prior to 1981, those institutions offering courses or programs coordinated with a Maine degree-granting educational institution (provided these programs are approved by the State Board of Education), and those programs conducted solely on a federal reservation.

Without legislative authorization, the State Board of Education may approve the application of an out-of-state institution to offer credit courses within the state of Maine, provided it is authorized to perform the duties of an educational institution in its own state. This approval may also be renewed by the State Board of Education.

MASSACHUSETTS

Off-Campus Programs

According to a procedure adopted in 1981, the Board of Regents reviews program proposals submitted by the state's public institutions in a two-stage process. As a first step, the institution's president submits a completed Intent to Plan form; approval by individual boards of trustees is not necessary at this stage. A specific question on the form asks whether the proposed program is to be located on- or off-campus (Quadrant A - BOTH IN).

The basic concerns at this stage include: the congruence of the proposed program with the institution's mission and goals; assurance that the proposed program is not unnecessarily duplicative of other programs in public or private institutions; and assurance that there is need and demand for the program and that adequate fiscal and human resources are available. The Intent to Plan proposal is circulated to all presidents and chancellors of Massachusetts public institutions.

After staff review and approval of the Intent to Plan, the president may submit a Program Proposal to the Board; this second stage requires prior approval by the institution's board of trustees. Emphasized at this stage are overall sufficiency of planning; adequacy of all resources needed; the program's academic integrity; and its relation to the institution's mission and goals. Components to be included in the program proposal include general information, information about the program's design and delivery system, and its evaluation material.

The Board of Regents sets standards for Massachusetts independent institutions, but these standards make no specific provision for programs occurring away from the main campus. Institutions fully accredited by the New England Association of Schools and Colleges are regarded as being in compliance with the published standards. Degree-granting authority may be reviewed if a reasonable probability of noncompliance is brought to the Board's attention, or if the institution enters into Chapter 11 reorganization.

Institutions chartered, incorporated, or organized in another state that wish to offer degree-credit courses in Massachusetts (Quadrant C - PROG IN) must meet specified criteria. The institution must file a Foreign Corporation Certificate with the Secretary of State; this Certificate is forwarded to the Board of Regents for Higher Education for evaluation, using the procedures and criteria specified. Two types of information are indicated: (1) immediately available items such as: the corporation's constitution and bylaws; educational objectives and the proposed courses of study; assets and existing financial support; and information on faculty; and (2) information in the form of a timetable showing how the educational objectives will be met by a given date, with emphasis on: plans for courses of study, present and future; plans for physical plant, equipment, and library development; enrollment plans, and requirements for admission, graduation, tuition and fees; plans for student services; and plans for obtaining financial support for the development, growth, and maintenance of the institution.

In addition, out-of-state institutions must have degree-granting authority in their home state; must be accredited by a regional or national agency; must have a resident agent in Massachusetts; must

have a home campus administrator appointed as administrator of the Massachusetts program; and must publish a brochure or catalog about the Massachusetts program that provides information about accreditation, calendar, admissions procedures, courses of study, matriculation procedures, qualifications of the faculty, and evaluation procedures.

The out-of-state program and its faculty must be of the same level and quality as at the home campus, and must be subject to the same institutional review and quality control. Likewise, the program and faculty must be of quality comparable to that characterizing similar approved programs offered in the state by Massachusetts-based institutions. Finally, successful completion of the course(s) must provide degree credit at the parent institution.

If the out-of-state institution seeks degree-granting authority in Massachusetts, its attention is also called to Massachusetts standards with respect to degrees; they are published in the same chapter of the regulations pertaining to independent institutions of higher education.

NEW HAMPSHIRE

Educational institutions within the state must be authorized by name by an act of the legislature to grant degrees. This requirement does not apply to degree-granting institutions now granting degrees which have been in continuous operation since 1775. The Postsecondary Education Commission determines which degrees an institution may grant once the state legislature has authorized it, by name, to grant degrees. In lieu of conducting its own evaluation, the Commission may accept regional, national, or specialized accreditation status.

In 1983 the Commission approved rules governing (1) the organization of an institution of higher learning, (2) the evaluation of degree-granting authority, and (3) the approval of plans by out-of-state institutions requesting permission to operate in the state. Although the second set of rules discusses procedures by which an institution may add a program not previously offered, they clearly refer to main campus operations. Thus, only the third set of rules is pertinent to this analysis.

Off-Campus Programs

Out-of-state institutions seeking to establish a branch or branches in New Hampshire (Quadrant C - PROG IN) must submit the same articles of agreement and information required of in-state organizations planning to organize a corporation for the purposes of higher education. Plans for the branch must be submitted to the Commission at least 120 days in advance of proposed implementation. Such plans should include information about: purposes and objectives;

control and administration; finances; faculty; students; the educational program; facilities; the library; student records; and college publications. All published material must describe the institution as it presently exists.

The out-of-state institution must also submit an educational impact statement, listing programs of a similar nature already offered in the state; identifying their current enrollments; specifying the target population for the proposed program; and outlining the steps already taken to coordinate the delivery of the proposed program with other institutions in the region.

Upon receipt of the specified materials, the Commission will usually appoint an evaluation team, although in lieu of this approach the Commission may accept regional, national, or specialized accreditation. Following its deliberations the Commission will approve or disapprove the articles of agreement and establishment of the institution's branch in New Hampshire.

VERMONT

Postsecondary schools which are not accredited by national or regional institutional accrediting agencies recognized by the Vermont State Board of Education must register their intent to operate in Vermont (Quadrant C - PROG IN) and must apply for state certification within 18 months. They may not offer degrees without certification by the Department of Education.

RHODE ISLAND

Off-Campus Programs

This state does not have monitoring requirements for programs offered by Rhode Island institutions away from their main campuses (Quadrant A - BOTH IN). On the other hand, it does monitor programs brought into the state by foreign corporations (Quadrant C - PROG IN). In 1983 the Board of Governors for Higher Education adopted a statement of "policy and procedures for authorization of out-of-state institutions of postsecondary education to offer courses, programs of instruction or award certificates and degrees in Rhode Island."

The Board uses several criteria to evaluate proposals for offering courses or programs or awarding degrees. Each of these criteria must be satisfactorily met, and information presented in a proposal format specified by the Board. The institution must be accredited by a recognized regional or national association, and present evidence that it is in compliance with the respective accrediting group's policies related to off-campus programs. Specialized accreditation status will be considered on an individual basis. In addition, the out-of-state institution must have comparable degree-granting authority in its home state; must prepare a clear statement of purpose which demonstrates at a minimum: sufficient student interest; that the proposed program is not unreasonably duplicative of existing programs; financial solvency, management practices and controls to maintain commonly accepted standards; and professionally prepared and experienced faculty assigned to the Rhode Island program in sufficient numbers to sustain high quality.

Attention is also directed to library, facilities, equipment, and other resources; to compliance with applicable local, state, and federal codes, including civil rights and affirmative action/equal opportunity, and to the institution's capacity to provide student services, maintain student records, and protect student rights. Admission, retention, and graduation standards must be consistent with those at the parent institution.

The process of proposal review will include evaluation and response by the Commissioner's staff and by representatives of the presidents of Rhode Island institutions; accreditation agencies and external consultants may also participate in the review.

Initial approval to operate is for a period of three years; conditional approval (for one year) or full approval (for an indefinite period) may follow. The Board of Governors' approval is required for any additional certificate or degree programs which the out-of-state institution proposes to offer. Procedures are specified for obtaining a certificate of authority to operate in Rhode Island, once initial approval has been granted.

Chapter 4

NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS AND THE STATES WITHIN THE REGION

Overview

The Commission on Institutions of Higher Education oversees colleges and universities offering academic programs at least one year in length in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming.

The philosophy of the North Central Association is to encourage responsible institutions in their efforts to make off-campus resources available, rather than to impose prohibitive restrictions on all who would offer such programs. Member institutions must request approval of off-campus degree programs when they constitute "substantive change" as defined by the Commission; approval is also necessary for out-of-state or out-of-country programs, including those at military bases. A set of standard questions has been devised to provide the Commission with information about off-campus offerings. This region's monitoring requirements apply equally to Quadrant A - BOTH IN or Quadrant B - INST IN locations, where the sponsoring institution is from within Association membership. No monitoring requirements are cited, however, for programs brought into the region, that is, for those at Quadrant C - PROG IN locations.

Of these nineteen states, four have no monitoring requirements for Quadrant A - BOTH IN, B - INST IN, or Quadrant C - PROG IN

locations, that is, they do not monitor programs of either in-state or out-of-state parent institutions. These states are Arizona, Iowa, Missouri, and Wyoming. Several states have no requirements for their own institutions' off-campus programs (Quadrant A - BOTH IN), and some states have none for programs of out-of-state institutions (Quadrant C - PROG IN). In addition, a number of states differentiate between requirements for public and private schools, and may have exemption policies. The most usual exemption is for parent institutions accredited by a regional or national association. Requirements among the states are uneven, with those of some jurisdictions being lengthy and specific, while those of other states are much less so. About half of these states require that institutions give attention to need for the program. One of the states has a well developed plan for provision of almost all higher education by that state's colleges and universities. A very few of the states refer to military base education, and usually that is a note about exemptions. Few of the states have site visit requirements, although about a quarter of them refer to periodic evaluations of off-campus programs. Several states specifically mention telecommunications offerings.

NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS

COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION

Off-Campus and Military Base Programs

After spending considerable time and energy reviewing off-campus programs and developing opinions and policies about these educational opportunities, the North Central Commission on Institutions of Higher Education has reached the following important conclusions: Many of these programs have been in place for some years and constitute a valuable educational resource; the Commission can assist or close the few which are lacking in quality; the way to remedy such problems is not to impose prohibitive restrictions on all who would offer off-campus programs, but rather to encourage responsible institutions in their efforts to make such resources available, within the usual accrediting safeguards. This might be viewed as a kind of "good money drives out bad" philosophy.

A North Central institution must officially request approval of any institutional change that requires alteration of its Statement of Affiliation Status. This policy covers the addition of off-campus degree program sites (Quadrant A -BOTH IN), and out-of-state or out-of-country degree programs sites (including military base programs) (Quadrant B - INST IN). Such institutional change, and the corresponding alteration of the Statement, must be approved by the Commission before the change is effected. An on-site visit may be required, before or after the change, but is not necessarily required before approval. If approval is denied and the institution effects the change anyway, its accredited status is automatically terminated.

The Commission distinguishes between substantive change and limited change, and its procedures vary accordingly. Depending on the circumstances, initiating off-campus programs may constitute either type of change. Offering a limited program at a small number of locations away from the home campus is considered limited change. Before initiating a limited change the parent institution must obtain any necessary legal authorization for the change and file it with the Commission; provide the Commission with requested information about the institution and the proposed change (for example, its relation to institutional mission, and resources and processes for initiating, maintaining and monitoring the change); and receive Commission staff approval for the change. A set of fifteen questions has been developed to provide essential information to the Commission about off-campus programs. Published in 1979, the questions probe such areas as the relationship between program purposes and institutional purposes; the dimensions of the planned program (including locations, numbers of students and faculty, and curricula and courses to be offered at each location); the procedures for approving courses and how they relate to the on-campus procedures; the procedure for recruiting and appointing teachers and for monitoring their quality, and how these procedures differ from the on-campus process; the physical resources needed, and their quality compared with those on-campus; the financial support pattern; and the provisions for full disclosure of all pertinent information, such as tuition, refunds, student financial aid, names and credentials of teachers, and names and locations of those from whom additional information may be obtained.

Requirements for reporting off-campus programs to the North Central Commission are the same for out-of-state and out-of-region sites (Quadrant B - INST IN). According to correspondence with the Commission, no special listings or scrutiny is required for programs within the same state as the home institution (Quadrant A - BOTH IN). On the other hand, plans for extensive off-campus programs, even within the same state, could constitute substantive change, and thus could lead to the monitoring of such in-state programs. North Central parent institutions initiating new off-campus programs are expected to respond to the set of fifteen questions previewed above, whether the instructional location is to be out-of-state or out-of-region. Responses to these questions form part of an institution's initial application for approval of off-campus programs.

A new institutional evaluation instrument, developed under Commission auspices and published in 1982, provides a series of schedules directing attention to the various areas of institutional life, listing sources of information about each area, and posing questions for the institution to consider. Schedule IX(B) gives attention to continuing education, off-campus programs (including military sites), and evening, weekend, and multicampus degree programs. Listed sources of information include the institution's catalogs, brochures, contracts, and program evaluations. Some of the fifteen questions noted above for institutions planning off-campus programs have been incorporated into this Schedule. The Schedule's questions focus on qualifications of the instructional staff; standards for admission, for the awarding of grades and credit, and for the recording of credit on the transcript vis-a-vis those

standards and practices on the main campus; use of instructional methods consistent with the institution's mission and appropriate to the student clientele; relation of the program to institutional mission; faculty hiring and evaluation policies to insure that adjunct and part-time faculty are equivalent in competency to on-campus faculty, and staff development procedures sufficient to insure that the achievement standards of the institution are understood and implemented; provision of access to learning resources appropriate to the program; provision of information about admissions procedures, financial aid, and course requirements to prospective and enrolled students; equivalency of course content, level of performance, and course numbering system for on- and off-campus programs; and an administrative organization through which the institution may monitor the quality of the program.

The Schedule IX(B) materials apply to institutions with military base programs, and presumably to those with study abroad programs, although the latter are not specifically mentioned. North Central does not publish specific monitoring requirements for either type of program. One of their publications gives some attention to protocol when, by virtue of a program's interregional location, one regional Commission travels into another's territory for evaluation purposes. No monitoring requirements are cited, however, for programs brought into the North Central region by parent institutions from other regions (Quadrant C - PROG IN).

ARIZONA

Off-Campus Programs

Off-campus programs currently located in Arizona are sponsored by both Arizona institutions (Quadrant A - BOTH IN) and out-of-state institutions (Quadrant C - PROG IN). There are no state regulations to address either of these situations, however. Instead, the state relies on its consumer fraud statutes to control the quality of these off-campus programs.

ARKANSAS

Off-Campus Programs

Off-campus programs within Arkansas offered by Arkansas state institutions (Quadrant A - BOTH IN) are governed by the most recent masterplan adopted in October of 1978. The masterplan provisions, which appear to be working well so far, provide that a state institution planning to offer a course within the assigned service area of another state institution communicate with the local institution to assure that there will be no duplication of effort or program conflicts.

State law requires that out-of-state institutions offering courses in Arkansas (Quadrant C - PROG IN) be certified by the State Board of Higher Education. Submission of a formal application, formal review, and action by the Board are prerequisite to such certification. Guidelines for obtaining this certification serve as well for chartering a new Arkansas institution. For certification, information must be provided about: the general nature of the institution, including the proposed location(s) and the target population to be served; the sources and numbers of students expected to enroll; demonstration of a well-documented need for the proposed offerings; documentation of benefits expected to accrue to students completing the program; evidence of sufficient institutional stability and quality of faculty in particular to assure a high-quality offering; documentation that library resources will be adequate to support the offerings; evidence of financial stability; and plans for adequate physical facilities. An applicant institution should have

the highest level of accreditation available to it; offerings should be appropriate to the institution's experience and goals; and there should be full disclosure on which the consumer can base decisions about participation. Information must also be provided about impact upon offerings of other institutions, both in Arkansas and in adjoining states; and about impact upon the desegregation of higher education. Certificates issued will be reviewed periodically. For regular reviews, the Institutional Certification Advisory Committee will decide whether a visiting team is needed.

Off-campus programs offered outside of the State of Arkansas by Arkansas state institutions (Quadrant B - INST IN) are reviewed under the new program review policies of the State Board of Higher Education if the offerings permit a student to receive all or essentially all of the credits necessary for a certificate or degree or if the offerings constitute a center or other agency established in a permanent and recognizable manner.

Military Base Programs

State law requires that out-of-state institutions operating in Arkansas be certified by the State Board of Higher Education, but military programs are exempt if the Base Education Officer certifies that the course is formally approved by the federal government with respect to quality, that the course is approved for direct federal tuition or contract payments to the institution for military students enrolled, and that the majority of students enrolled in the course are military personnel. In the latter connection, dependents of personnel are not considered military personnel. In the absence of a question about exemption, the State Board will accept the certification of the Base Education Officer.

COLORADO

Off-Campus Programs

The state requires that all off-campus instruction (Quadrant A - BOTH IN) delivered by publicly supported four-year institutions be offered only in the Outreach program, and under the policies of the Colorado Commission on Higher Education. Instruction via broadcast media or cable, beyond the campus of these institutions, is also part of the Outreach program and subject to its policies. An extensive set of policies and procedures has been approved by the Commission. A request for an Outreach spending authority allocation indicates the institution's agreement to follow the Commission's policies and procedures. Each institution designates one administrative unit and officer to take responsibility for planning and management of all Outreach programs t..erein; no off-campus program may be initiated except through this unit.

Primary service areas are assigned to each of the institutions by the Commission; within this area the institution offers courses and programs in response to educational needs of the citizens. Media instruction is not limited to the assigned geographic service area. A coordinating procedure is described for proposals to offer a course or program outside of the assigned service area. Some programs are also offered statewide by designated institutions. An Outreach institution must not duplicate credit courses offered in a community by the local school district, a board of cooperative services, or a community college within its own district (except on military installations) unless the Commission has granted prior approval. Arrangements for

support of Outreach programs are described in detail by the Commission. Other monitoring requirements for Outreach offerings address minimum class sizes, student qualifications, student services, faculty standards, faculty and administrative compensation, course approval and quality control, policies on independent study, and credit earned in off-campus programs (which is awarded and entered on the student record without distinction between on- and off-campus courses). Guidelines for Outreach recordkeeping are also very detailed; forms are provided for collecting data base information.

The Commission has statutory responsibility for authorizing certain types of institutions to offer degrees or degree credits. These types include publicly supported colleges and universities; properly accredited private colleges and universities, postsecondary seminaries and Bible colleges; and private occupational schools authorized by the State Board for Community Colleges and Occupational Education. Under the statute, a private college or university is an institution doing business in Colorado which offers degree credit courses. An out-of-state publicly supported college or university is treated like a private college or university and is authorized to offer degrees if it qualifies under the criteria for those institutions. In general, regional, national or specialized accreditation provides evidence of such qualification, and under the Act the institution is eligible to receive notification of acceptable status from the Commission. For private institutions (or out-of-state public institutions), no monitoring requirements *per se* are published to guide offerings away from the main campus.

Military Base Programs

By agreement, military base education directors follow the Colorado Commission on Higher Education's approved procedures for postsecondary services on military bases. That is, the military education directors utilize the Outreach institution assigned to the service area in which the base is located to provide needed instruction. If the institution does not or cannot deliver the requested program, the military education director will be referred to an alternative Outreach institution. Only when Colorado institutions cannot deliver the needed educational services may out-of-state institutions do so. A standard form letter to be sent from the base to the nearby Outreach institution is reproduced as an appendix in the Outreach policy manual. The form letter includes requirements noted above with respect to using the nearest appropriate Outreach institution, or an alternative Colorado institution, before turning to an out-of-state source. Requirements are also specified for advertisements about military base programs.

ILLINOIS

Off-Campus Programs

In 1981 the Illinois Board of Higher Education appointed an advisory committee to study off-campus programs, and charged it to consider guidelines and criteria to be utilized for off-campus program approval and review. The committee's policies have been unanimously recommended to the Board, along with a further recommendation that the Board pursue legislation which will authorize it to apply the need criteria developed by the group to out-of-state and independent institutions. The recommendations require coordination and cooperation between Illinois institutions (both publicly and privately controlled) and out-of-state institutions wishing to offer programs at Illinois locations. Board of Higher Education approval would be required before any institution could offer a degree program at a new site, if the offering would provide more than 50 percent of the minimum number of credit hours that must be taken at the institution in order to complete a degree program. Board approval would not be site-specific for telecommunications or home-study types of offerings, although for the former, programs might be approved on a regional or statewide basis. Programs offered out-of-state by Illinois institutions (Quadrant B - INST IN) would not require Board approval, but such instructional activities must be self-supporting.

The committee's report also included detailed procedures for planning, developing, and implementing off-campus programs. For example, following receipt of a letter of intent from the proposing institution, the Board would notify other Illinois colleges and

universities of degree program plans so that interested institutions could work with the proposing institution to avoid unnecessary program duplication, to consider potential cooperative efforts, and to identify broader areas of service to the public.

Under the committee's recommendations, the academic standards for off-campus programs would be equivalent to those maintained on campus. Specific criteria leading to Board approval of a new degree program site are listed in the recommendations. Attention is given to mission and objectives, academic control, curriculum, faculty and staff, support services, financing, program information, and accreditation and professional program licensure.

The Board would be authorized to review periodically the programs of all public colleges and universities as well as those of independent and out-of-state institutions. Authorization to offer degree programs at program sites would be continuous unless compliance with stated criteria were not maintained.

INDIANA

Off-Campus Programs

The 1976 edition of the Indiana Code outlines the responsibilities of the Commission for Higher Education, one of which is to approve or disapprove the establishment, by public institutions, of any new branches, regional or other campuses or extension centers, or any new college or school, or the offering on any campus of additional degrees, or additional programs of two semesters or their equivalent leading to a certificate. Approval of a new academic program is location-specific. The Commission should be advised whenever 50 percent or more of the credit hours prescribed for the technical or major component of a degree are attainable at a site which does not have degree-awarding authority, or when the institution plans to offer a degree program at a new site.

A "New Program Proposal Form" is used for submitting all program proposals, copies of which are sent to all other public Indiana institutions and to independent colleges offering related programs. These criteria used by the Commission in evaluating new program requests are as follows: quality and efficiency; appropriateness in terms of institutional mission; availability of similar programs; the program's personal and social utility; student and market demand; and interinstitutional cooperation. To approve a degree program is to grant a "license" to announce and offer it, and to certify accomplishments within it. Primary responsibility for the review and approval of new vocational education programs rests with the State Board of Vocational and Technical Education. The cycle for

review of an institution's existing programs, by the Commission or by the State Board, should incorporate newly approved programs.

New academic program proposal information should be organized according to the Commission's outline; for new vocational education programs, the forms and procedures of the State Board of Vocational and Technical Education should be followed. Items to be included for the Commission's review focus on program description; program rationale; program implementation and evaluation; and budgetary considerations.

The enabling legislation states that, in developing a long range plan for Indiana's postsecondary education, the Commission should "take into account the plans and interests of the state private institutions." The legislation does not refer, however, to approval/disapproval power over the private sector's off-campus programs. Likewise, with respect to out-of-state institutions wishing to bring programs into the state (Quadrant C - PROG IN), the legislation does not specify an approval process. Legislation establishing the Indiana Commission for Postsecondary Proprietary Education requires that no person shall do business in the state as a postsecondary proprietary educational institution without having obtained accreditation (defined as the written document issued by the Commission attesting to the school's compliance with minimal standards and required procedures). Neither public institutions nor privately endowed regionally accredited Indiana institutions are subject to the rules of this (proprietary) Commission, however.

In summary, the Indiana Commission for Higher Education is responsible for the off-campus degree program operations of publicly supported Indiana institutions (Quadrant A - BOTH IN), but not for

those of private institutions or of out-of-state institutions offering academic programs in Indiana (Quadrant C - PROG IN).

IOWA

Off-Campus Programs

At present, Iowa has no laws that pertain to the monitoring of off-campus programs sponsored by parent institutions domiciled in Iowa or in other states.

KANSAS

Off-Campus Programs

Kansas publications sent to the project office refer only to community college policies for off-campus programs. Apparently there are no monitoring requirements for off-campus programs sponsored by other public or private institutions in Kansas (Quadrant A - BOTH IN) or by out-of-state colleges and universities (Quadrant C - PROG IN).

The Kansas State Board of Education is responsible for approving all community college programs, as well as individual courses at each community college. By definition, then, this body has approval power over the colleges' off-campus programs, whether they take place within or outside of the college's district (county).

Application for approval of an out-of-district course is submitted to the Postsecondary Administration Section of the State Board at least thirty days prior to the proposed first class session. Such courses must carry residence credit, be commensurate in quality to on-campus courses, and be applicable to regular on-campus programs. Faculty must be qualified and must be chosen according to on-campus faculty criteria. Community colleges must not offer instructional activities in the six Kansas counties where regents' institutions (Kansas public institutions) are located; some exceptions are noted. Community colleges are not permitted to directly duplicate educational offerings in a given service area. Moreover, when the community college enters a community in which an independent college is domiciled, the community college must initiate contact in order to inform the independent college of its plans.

MICHIGAN

Off-Campus Programs

Documents issued by the Michigan Department of Education outline policies and procedures for the establishment and approval of nonpublic Michigan colleges and universities, and of programs brought into Michigan by nonpublic out-of-state institutions (Quadrant C - PROG IN). No monitoring requirements have been issued for off-campus programs sponsored by Michigan's public institutions. Correspondence with the Department indicates that an out-of-state institution wishing to operate a Michigan program "is treated identically to a proposed Michigan domiciled institution of higher learning."

Michigan's General Corporation Code requires approval by the State Board of Education as a prerequisite to issuance of a corporate charter permitting the granting of degrees, and for any charter revisions affecting the educational purpose of the institution. Institutions wanting to make changes which would require an amendment to existing articles of incorporation must have these changes approved by a visitation committee; the procedure is the same as that used for an institution's initial approval. Such an amendment is necessary if the nonpublic college or university wishes to expand its operations or degree offerings beyond what is permitted by its present charter (Quadrant A - BOTH IN).

Whether for initial charter approval or amendment, the State Board of Education must review the proposed program in the areas of housing space and administrative facilities; proposed educational program; laboratory, library, and other teaching facilities; faculty

and staff; and minimum paid-in capital as required by law and Board policy. The Attorney General has ruled that the State Board of Education must make a finding of adequacy in each of these areas before articles of incorporation are filed for Michigan institutions, or before a certificate of authority can be issued to an out-of-state institution (Quadrant C - PROG IN). The Department of Education publishes guidelines on determining the adequacy of educational enterprises, and on procedures for evaluating institutions' proposals. The Department requests the Board to appoint an ad hoc committee of scholars from Michigan institutions, to evaluate the articles of incorporation (or proposed amendments), and the extensive written material and exhibits required, and to visit the Michigan premises if they already exist. Members of the review committee are reimbursed for actual expenses by their own institution, or by the proposing institution. Department staff may recommend waiving the appointment of a review committee for an amendment proposal if the institution is already approved for operation in the state and if the program is related to degrees already approved. By December of each year, private educational institutions approved to operate in the state must submit to the Board a report listing the name of each trustee, officer, and teacher; estimating the number of students; and including a statement of the property, amount of stock subscribed, donated and bequeathed, and the amount actually paid in; and other information exhibiting the institution's condition and operations. Michigan legislation also requires triennial inspections of educational corporations by the Board, and a filing of the resulting report with the Michigan Corporation and Securities Commission.

MINNESOTA

Off-Campus Programs

This state's public institutions are not subject to any published regulations with respect to offering programs away from the main campus (Quadrant A - BOTH IN). Private institutions domiciled in Minnesota and out-of-state institutions (public and private) must register with the Minnesota Higher Education Coordinating Board and seek approval to grant degrees or to use any of these terms in their names: academy, college, institute, or university. Published information does not refer to off-campus offerings *per se*, nor is substantive change in an institution's operations (such as the addition of an off-campus program) addressed. However, the colleges and universities covered by these requirements (that is, private in-state and public or private out-of-state institutions) must register annually with the Board, so presumably such program additions would be reported in this fashion. The form provided for this registration requests an addendum sheet if there is more than one school location. The Board annually adopts and publishes a list of schools approved to offer degrees, and a list of the specified degrees so approved.

To the extent that the Minnesota regulations for registration and Board approval apply to off-campus programs, monitoring requirements may be said to exist for both Quadrant A - BOTH IN and Quadrant C - PROG IN locations; that is, for off-campus instructional programs sponsored respectively by in-state (private) or out-of-state (public or private) parent institutions.

The annual registration requires such information as a copy of the articles of incorporation, a duly adopted statement of the institution's mission and goals, and a copy of the catalog giving other information (e.g., names of board members, officers, and faculty; description of all facilities, current course offerings, requirements for course and degree completion, the school's policy with respect to freedom of expression; current information on tuition and fees, refunds, transfer policy, and policies pertaining to admission and evaluation). Also required is a copy of the fiscal balance sheet or an income statement for a public institution domiciled outside of Minnesota (Quadrant C - PROG IN), and a copy of all promotional materials and advertising. Degrees granted by registered institutions which meet the requirements of the legislation will be approved by the Board if the institution further provides: teaching personnel to staff the programs for each degree to be approved; educational programs leading to such degrees; appropriate and accessible library, laboratory and other physical facilities to support the degree program; and a rationale showing that the degree program is consistent with the school's mission and goals.

MISSOURI

Off-Campus Programs

According to correspondence with the Missouri Coordinating Board for Higher Education, this state has "a well-defined set of guidelines for off-campus courses or programs offered by institutions located in-state," but "there are no comparable guidelines for out-of-state institutions which choose to offer courses or programs in Missouri."

In 1977, the Coordinating Board for Higher Education authorized the establishment of a Task Force on Off-Campus Education, comprising representatives of all sectors of higher education and of the Department of Higher Education. The Task Force was established to address two primary issues: duplication, and quality of course offerings at off-campus locations. A survey of all off-campus offerings was also undertaken. In 1978 the Board adopted the Task Force's report and guidelines as a policy statement to be followed by all Missouri higher education institutions: two- and four-year colleges and universities, public and private. Also recommended and adopted by the Board was the establishment of regional coordinating councils in those areas where problems of duplication may exist.

The guidelines focus on: determination of courses to be offered; standards for credit courses; faculty; administrative organization and academic policy; availability of educational resources and suitability of facilities; student services; credit for prior learning; and noncredit instruction.

NEBRASKA

Off-Campus Programs

There are no rules or regulations pertaining to off-campus operations of Nebraska institutions within the state (Quadrant A - BOTH IN). The Nebraska Coordinating Commission for Postsecondary Education is requested to "sign off" on programs offered by out-of-state institutions (Quadrant C - PROG IN) after reviewing them as to need, availability within the state, and quality of content.

Out-of-state institutions apply directly to the Coordinating Commission for registration and authorization to offer courses or degree programs in Nebraska (Quadrant C - PROG IN). An application form is provided. Data requested in support of an application include: authorization to operate; proof of accreditation, including (if appropriate) the accreditation of programs offered off-campus; institutional catalog; statement on transferability of credit; listing of courses and degree programs to be offered in Nebraska; faculty qualifications; description of other resources, such as facilities, instructional equipment, and library collections; relationship to Nebraska postsecondary institutions, (for example, for transfer of credit, use of joint faculty, facilities or other supportive relationships, and cooperative arrangements for the delivery of courses or programs in Nebraska); and a copy of an agreement which states that all announcements and course registration materials will indicate transferability of credit to the main campus.

The executive director of the Coordinating Commission informs the out-of-state institution of the Commission's decision. The authorization to offer courses and degree programs is reviewed after two academic years; favorable review results in a five-year extension. An annual report must be provided showing the number of courses offered and their enrollments, and the number of degrees granted.

Military Base Programs

The Coordinating Commission for Postsecondary Education is authorized to register out-of-state institutions which wish to offer courses or degrees within the state. Courses offered on a federal military installation are exempt, however, provided the courses are offered solely for military personnel, dependents, or civilians employed on such installations.

NEW MEXICO

Off-Campus Programs

Monitoring requirements developed by this state apply to out-of-state institutions only (Quadrant C - PROG IN), and even in this category there are exemptions. Legislation enacted in 1979 also distinguishes between out-of-state proprietary and nonproprietary institutions which propose to offer programs in New Mexico.

According to the Post-Secondary Educational Institution Act (1978), nonproprietary institutions wishing to offer a course in New Mexico, unless exempt, must submit a completed application form to the Board of Educational Finance sixty days prior to the beginning of the proposed course. This Act, however, does not apply to: institutions supported by state or local taxes; any private institution which provides a basic academic education comparable to that provided by public colleges or universities or by private accredited colleges or universities; institutions whose credits or degrees are accepted for credit by at least three accredited institutions of higher learning; and out-of-state proprietary schools (which are subject instead to the 1978 Out-of-State Proprietary School Act). Institutions claiming exemption must present satisfactory evidence to the Board of Educational Finance.

Institutions not exempt from the provisions of this legislation must obtain a permit or certificate of approval from the Board before beginning operations in New Mexico. The staff of the Board reviews the application, taking into consideration: the validity of the course, evaluated by examining a complete course description;

acceptability as work toward a degree at the parent institution; the awarding of no more than one semester credit per week for short courses or workshops; the provision of at least 15 contact hours per credit hour for lecture-type courses, and 25 contact hours for workshop-type courses; the availability of adequate library and other teaching resources; faculty qualifications, which must be the equivalent of those acceptable on the home campus for regular faculty teaching at the same level of instruction; and the availability and accessibility of the proposed course in New Mexico. Within thirty days of Board action, it will certify to the State Board of Education those courses approved and disapproved. The Act further requires that the State Superintendent of Public Instruction provide each local school superintendent with a list of all courses approved and disapproved.

NORTH DAKOTA

Off-Campus Programs

North Dakota's monitoring requirements for programs offered in the state by out-of-state parent institutions (Quadrant C - PROG IN) are based on the 1977 Postsecondary Educational Authorization Act. Exemptions to the Act include North Dakota public institutions, any consortium which includes at least one public institution, and private four-year institutions chartered or incorporated and operating in the state prior to 1977, so long as the private institutions retain national or regional accreditation. Newly established North Dakota institutions may be issued a provisional authorization to operate on an annual basis until the institution becomes eligible for accreditation. There are no statewide monitoring requirements for off-campus programs offered by institutions domiciled in North Dakota (Quadrant A - BOTH IN). According to a communication from the State Board of Higher Education, "Institutions located within our state are governed by the Board of Higher Education with individual approval of courses to be offered outside of the campus."

Institutions requesting licensure with the Commissioner of Higher Education must provide, on a form supplied by that office, the following set of information for each course offering: name and address of the institution; exact course title and academic level of the course; name of the instructor, with academic rank and a comprehensive vita; place of instruction by city and building; beginning and ending dates of the course; number of class meetings per

week and number of class hours per session; total instructional contact hours; cost to the student; anticipated enrollment; acceptability of the course's credit at the parent institution; statement of the course's purpose and its value to North Dakota; description of the potential audience and evidence of need for the course in the state; description of the course and its content; and plans for course announcement and advertising. Institutions registering a program (rather than a course) must complete a standard form indicating: the program's HEGIS (Higher Education General Information System) code; degree options; number of credit hours required for the degree; requirements for the degree that can be met in North Dakota, and other requirements. Subsequent offerings of the same program or course in other North Dakota locations require submission of the same information.

Some additional information is required for the first application. Such information would include a formal response from the accrediting agency regarding its evaluation of the institution's off-campus offerings, including: the visiting team's response to on-site visits to North Dakota and/or similar sites; the institution's statement of reasons for offering courses in North Dakota; a description of the instructional and supportive resources and academic supervision which will be available in the North Dakota location; the course or program's relation to the institutional mission; the most recent catalog and financial report; and the student consumer information statement required by the Higher Education Act.

OHIO

Off-Campus Programs

The Ohio Board of Regents authorizes all off-campus degree programs on a site-specific basis; in addition they require that all collegiate institutions offering courses in Ohio be authorized, whether the courses are delivered through campus instruction or "the mediating technologies." Both public and private Ohio institutions (Quadrant A - BOTH IN), as well as out-of-state parent institutions (Quadrant C - PROG IN), must have a certificate of authorization from the Regents in order to operate a program at a specific site. The Information Request Document required for the review and approval process is the same for public and private applicant institutions, although some of the questions apply only to institutions under one or the other type of control.

A flow chart of twenty-two steps is provided to illustrate the process of approval for an off-campus degree or degree program. An institution planning to develop or extend a degree program off-campus must submit an application for the Regents' approval at least six months prior to program initiation. At the same time the institution must file a formal statement of intent to apply for Regents' authorization. The statement of intent is forwarded by the Chancellor's office to the presidents of all other colleges and universities within 50 miles of the proposed site. They may react to the proposal within a one-month period.

For approval to initiate the proposed program, the sponsoring institution must provide evidence of compliance with the Regents'

standards for off-campus degree programs. In addition to completing the forms provided, the institution must furnish other exhibits: for example, a description of the curriculum of the proposed program, with a list of its courses and copies of course syllabi and bibliographies; a description of administrative arrangements; a roster of administrative and instructional staff, vitae for the latter, and the level of their workload involvement with the proposed program; a description of the physical plant and facilities, including classrooms, laboratories, and library resources; a projection of financial needs and sources of income available; and information about the use of consultants or advisory committees, and their reports. Applications for Regents' approval of off-campus degrees and degree programs are evaluated on the criteria of academic quality, need, alternatives available within a 50-mile radius of the proposed site, costs, institutional priority, and support.

OKLAHOMA

Off-Campus Programs

In 1981, the Oklahoma State Regents for Higher Education replaced four previous policy statements with a set of standards and procedures for the operation of extension and public service programs at state system institutions. According to correspondence received, this policy statement applies to off-campus courses and programs sponsored by parent institutions domiciled either within Oklahoma (Quadrant A - BOTH IN) or outside the state (Quadrant C - PROG IN). The 1981 statement suggests that, as they evaluate the need for off-campus classes, state-system institutions take into consideration the resources available in Oklahoma's private institutions. No monitoring requirements have been developed for private institutions planning to offer programs away from the main campus. Thus, monitoring requirements apply only to the off-campus offerings of the state's public institutions (Quadrant A - BOTH IN) and to those brought in by out-of-state parent institutions (Quadrant C - PROG IN).

The State Regents' 1981 statement is divided into four sections: (1) standards and procedures for off-campus classes; (2) standards for awarding residence credit at off-campus locations; (3) application of credits earned by extension to degrees and certificates awarded at state-system institutions; and (4) a rather unique statement on the offering of courses for credit by means of electronic media.

The first section calls attention to such matters as the coordination of off-campus efforts among nearby institutions; the

necessity that off-campus units be self-supporting; the identification of faculty workload status on the main campus and at the off-campus site; the requirement that all extension students be formally admitted to some state-system institution; the choice of a semester or half-semester calendar for off-campus programs; procedures for requesting authorization to offer off-campus programs; and the necessity for comparable standards for on- and off-campus work. The existence of standards for awarding residence credit at off-campus locations attests to the differentiation between extension and residence credit that is made in Oklahoma. When residence credit is awarded at an off-campus location, the standards of education must be the same as those required for the awarding of such credit on the main campus.

The second section of the 1981 statement describes monitoring requirements with respect to the awarding of residence credit. For example, the institution should make no distinction between residence credit awarded for work completed on- or off-campus, and the standards observed with respect to the number of class meetings and total time spent in class should be the same as those observed on the main campus.

The third section of the 1981 statement stipulates that no more than one quarter of the credits applied toward a degree or certificate in the Oklahoma state system may be extension credit.

The fourth section provides guidelines for the offering of credit courses through electronic media. State-system institutions must get prior approval to offer such course work, following most of the same procedures required for obtaining approval for off-campus courses or programs. A series of questions illustrate the criteria considered by the State Regents in the approval of such course work: for example,

whether there is a need for the course offering that cannot be met by an on-campus course at a nearby college; whether the conditions for admitting, enrolling, counseling, teaching, evaluating, and testing students are appropriate and consistent with on-campus standards; and whether the proposed offering duplicates another institution's offering either on campus or through a competing electronic medium. In authorizing electronic media academic work for off-campus students, the State Regents make several determinations, including the academic level of a proposed course, the amount and type of credit, fees, and the geographic area covered by the offering.

Military Base Programs

The State Regents have authorized the granting of residence credit (rather than extension credit) for work taken by military personnel at specified military installations. Credit so earned will be considered the same as credit earned on an institution's main campus. The permanent nature of the educational facilities provided by the Department of Defense at these installations was cited as the reason for this specification of residence credit.

SOUTH DAKOTA

Off-Campus Programs

Legislation directed toward regulating nonpublic postsecondary institutions is the basis for monitoring the programs offered by out-of-state institutions (Quadrant C - PROG IN). Such institutions are considered in compliance with rules established by the Secretary of the Department of Education and Cultural Affairs if they are regionally accredited. The legislation, entitled Solicitation of Students by Nonpublic Schools, does not apply to any course offered by an accredited postsecondary institution domiciled in South Dakota, or by an educational institution or program operated under the auspices of the Division of Higher Education or the South Dakota Board of Regents.

All nonexempt postsecondary institutions wishing to maintain, advertise, solicit for, or conduct any course in the state must apply to the Secretary for an institutional license. The form provided asks for the following kinds of information: a description of the ownership and the names and addresses of the managing employees; the specific fields of instruction planned, and their objectives; a description of equipment and facilities, current enrollment, and maximum enrollment to be accommodated; and the qualifications of instructors and supervisors. The applicant must also furnish such exhibits as current financial statements, copies of all advertising and promotional literature used or planned, copies of enrollment agreement forms, current tuition and fees, and the procedures for collecting and refunding tuition, a surety bond, and copies of

inspection reports related to health and safety. Minimum standards are prescribed in such areas as financial resources, curriculum, facilities and equipment, faculty, health and safety requirements, and the catalog. Institutions offering training programs at more than one location must furnish the requested information and obtain a license for each location.

WEST VIRGINIA

Off-Campus Programs

Before they can implement a proposed off-campus offering, public colleges and universities domiciled in West Virginia must submit a request for program approval to the Board of Regents and must receive this approval (Quadrant A - BOTH IN). The Board of Regents has no regulatory powers over out-of-state institutions which bring programs into the state (Quadrant C - PROG IN), not are there any regulations pertaining to off-campus programs offered by West Virginia's private institutions.

WISCONSIN

Off-Campus Programs

Neither the state of Wisconsin nor the University of Wisconsin (UW) system has regulations pertaining to offerings in Wisconsin by out-of-state parent institutions (Quadrant C - PROG IN). There are guidelines for the University of Wisconsin system, but not for private institutions which offer off-campus programs (Quadrant A - BOTH IN). The guidelines emphasize coordinative relationships between UW-Extension and other UW institutions for off-campus credit course offerings. Primary Service Areas have been established, but strict regionalization of the state for outreach credit needs has been rejected in favor of a commitment to cooperative planning, institutional restraint, and professional courtesy.

Over 1,000 off-campus credit courses are offered each year by UW institutions; coordination of this effort requires detailed procedures for planning and implementation. The administrative guidelines outline a series of decision points, with suggestions for their resolution: for example, determination of how a course is to be budgeted, which institution is to supply support services; and determination of course viability (go/no go). A flow chart documents the processing of client requests, needs, and institutional proposals for off-campus courses. There are also guidelines for business and reporting details: for example, procedures for handling enrollment data and fees for ad hoc/overload/purchase-of-load courses. Policies have been developed for mediated credit courses, which include those delivered from origination points outside of the state.

WYOMING

Off-Campus Programs

This state has no monitoring requirements for off-campus programs, whether sponsored by public or private Wyoming institutions (Quadrant A - BOTH IN) or by out-of-state institutions (Quadrant C - PROG IN).

Chapter 5

NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES AND THE STATES WITHIN THE REGION

Overview

The Commission on Colleges in this region accredits programs of at least one academic year in Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington states.

This Commission monitors off-campus, military base and study abroad programs; information required from the parent institutions for these types of programs is similar to that specified by the Middle States Association. Although the Commission on Colleges gives some separate attention to the three types of programs, correspondence with the Commission reflects that it does not regard them as operationally distinct. Their Handbook also provides information about review of programs sponsored by out-of-region parent institutions (Quadrant C - PROG IN), and guidelines on contractual relationships with non-regionally accredited organizations.

A majority of these states have monitoring requirements for out-of-state programs (Quadrant C - PROG IN), but this is not the case for programs sponsored by in-state institutions (Quadrant A - BOTH IN), if exemptions are taken into consideration. Depending on the state, for Quadrant A - BOTH IN locations there may be exemptions for either private or public in-state parent institutions. For several states the exempting circumstance is accreditation. Monitoring usually involves academic, administrative, and financial matters, along with concerns about facilities and equipment, although about two thirds of these

states also took note of learning resources and public information issued by the institution or program.

NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES

COMMISSION ON COLLEGES

The responsibility for evaluating and accrediting postsecondary institutions in this region has been assigned to the Commission on Colleges by the Northwest Association of Schools and Colleges. When accreditation is granted it applies to the entire institution, but substantive changes initiated between periodic evaluations are not automatically included. Establishing instruction at a new geographic location (by the addition of a branch operation, external degrees, and/or programs and courses for credit, as well as through contractual relations with non-regionally-accredited organizations or institutions for educational programs and courses for credit) is defined as a substantive change by this Commission.

Specified information on a proposed substantive change must be provided to the Commission by a candidate or accredited institution at least ninety days in advance of the change. Data to be included in the prospectus are very similar to those required by the Middle States and New England Commissions prior to establishment of an off-campus program. To avoid unnecessary duplication in this volume, the reader is referred to the Middle States section for these monitoring requirements.

Off-Campus Programs

The Accreditation Handbook of this Commission includes a procedural guide, a manual of standards which serves as a guide for self-study, and a series of policy statements on principles and practices

recommended to all institutions within its jurisdiction. Monitoring requirements for various types of programs located away from the main campus may be found in all three sections of the Handbook. For example, the information on substantive change is included in the Procedural Guide section, and Standard VI (described below) discusses continuing education and special instructional activities. Policy Statement (PS) VIII addresses accreditation of operationally separate units; PS X considers accreditation of U.S. institutions outside of the United States; PS XI covers study abroad programs; PS XIV provides guidelines on contractual relationships with non-regionally-accredited organizations; PS XV discusses postsecondary educational programs conducted by accredited or candidate institutions on military bases; and PS XXII is concerned with accreditation, special programs, and off-campus educational activity (including a statement about review of programs offered by institutions located outside the Northwest Region (Quadrant C - PROG IN)).

The Handbook's discussion of continuing education and special instructional activities emphasizes postsecondary service to adults who may be unable to participate on a full-time basis. As examples of such activities, the Commission cites external degree programs, off-campus classes, extension programs, off-campus centers, study abroad, and media instruction. Such activities require an identifiable administrative responsibility, supported by the central administration, to provide coordination; staff and financial support appropriate to the program; adequate and qualified faculty, whose service in these activities is considered in tenure and promotion evaluations; student services appropriate to the adult student who often works full-time; an equitable fee and refund structure, and the provision of informa-

tion about available financial aid for the part-time student; evaluation of programs and courses in order to provide responsive programming; granting of credit policies consistent throughout the institution; and provision for academic resources such as library and laboratories.

The Commission recognizes both operationally separate units (which are degree-granting), and off-campus centers (which usually do not offer full degree programs). The first type should normally be evaluated as an autonomous institution; requirements noted above for continuing education programs apply to the off-campus centers.

To the extent that programs offered through contractual relationships with non-regionally-accredited organizations take place away from the main campus, their monitoring requirements are of interest to this study. This Commission has guidelines for such contractual arrangements. Some matters covered by these guidelines include aspects of the contract; the enrollment agreement; tuition, refund, cancellation, and collection policies and practices; student recruitment; and the responsibilities of field agents.

Military Base Programs

Like the Middle States and the New England Commissions, the Northwest Commission on Colleges publishes guidelines not only for the institutions providing educational opportunities on military bases, but also for the military personnel who benefit from these programs. Because these guides to institutional responsibilities and military obligations are very similar to those discussed in the Middle States section of this volume, they will not be repeated here. There are some differences: The Northwest Commission, like the New England body,

emphasizes the need for greater uniformity of policy and practice among the various branches of the military.

Study Abroad Programs

The Commission's guidelines for study abroad programs (Quadrant B - INST IN) are also very similar to those reviewed earlier for the Middle States Commission and the New England Commission. Details may be found in the Middle States section.

Nonprofit postsecondary institutions established outside of the United States primarily for the purpose of serving American nationals may seek institutional accreditation through an initial application to the Council on Postsecondary Accreditation (COPA). This Council will assign responsibility for their evaluation and accreditation to one of the six regional commissions.

Even though the Northwest Commission's Accreditation Handbook gives some separate attention to the three types of programs, correspondence with the Commission indicates that it does not regard off-campus, military base, and study abroad programs as operationally distinct. For example, an institution which proposes to initiate a military base or study abroad program is expected to submit a prospectus ninety days in advance, just like an institution proposing an off-campus program.

ALASKA

Off-Campus Programs

According to a statute that became effective in 1976, all public and private postsecondary institutions offering or wishing to offer instruction in the state of Alaska must seek authorization to operate, or specific exemption, from the Alaska Commission on Postsecondary Education; this legislation covers both Quadrant A - BOTH IN and Quadrant C - PROG IN locations. The state's publications make clear, however, that it has no intention to hamper the development of innovative educational delivery systems. Types of organizations eligible for exemption from the provisions of the authorization statute (for example, from certain bonding and fee requirements) include publicly operated institutions and nonprofit institutions conducting degree credit-bearing programs in the state (but not by correspondence). Institutions wishing to offer instructional programs must adhere to certain minimum standards: for example, the quarter, semester, or clock hours necessary for specific degree levels. Compliance with such institutional standards is assumed, however, for Alaska-based institutions holding national or regional accreditation, that is, for Quadrant A - BOTH IN locations of accredited parent institutions.

Institutions not eligible for an exemption must file an application for Authorization to Operate. The explicit intent of the Commission is to focus its institutional evaluation on the stated goals and purposes of the applicant institution. In addition to a statement of these goals, the application must include complete information about a

range of items: for example, need for the program; degrees or certificates offered; faculty and administrator qualifications; contractual or consortial agreements; admission policies, fees and refunds, and student performance standards; facilities and equipment; governance and financial management; and accreditation. Documents required include the catalog; student handbook; specimen copies of items such as schedule of classes, admission application, and refund schedule; a copy of the latest annual financial report; evidence of bonding for each agent; and evidence of accreditation, if appropriate. Unless the institution is exempt from payment of fees, both the institution and each agent must pay an initial and a renewal fee. The separate application for an agent's permit defines this role. During the application period, an onsite review is scheduled. Possible outcomes include denial or provisional authorization as well as Commission authorization. Authorization to operate is valid for a period of between one and three years. Substantial change in the educational programs, management, or institutional mission must be promptly reported to the Commission.

Military Base Programs

Postsecondary educational institutions established, operated, and governed by the United States are exempt under Alaska's statute for regulating postsecondary educational institutions. Military base programs are not specifically mentioned.

IDAHO

Off-Campus Programs

Idaho's monitoring requirements for off-campus instruction apply only to public or private out-of-state parent institutions, that is, to Quadrant C - PROG IN locations. The State Board of Education maintains a register of courses and programs offered anywhere in the state by such institutions; it critically evaluates these offerings by comparing them with the courses, programs and faculty of postsecondary institutions under the direction and control of the State Board.

A Compliance Request Form must be filed with the Board for each proposed individual course or program prior to its offering or reoffering in Idaho. Announcements of the program may not, however, include the name or the fact of registration with the Office of the State Board of Education. The purpose for instituting the program must be consonant with the mission of the parent institution. The parent institution must demonstrate the program's essential equivalency in quality to home campus offerings, especially in the following areas: selection and evaluation of faculty; approval procedures for courses or programs; the stature of the curriculum; the admission, guidance and evaluation of students; support offered by library, classroom and other resources; the home campus administrative responsibility for the program; and the keeping of student records.

Due to the heavy and sophisticated demands made by doctoral programs, there are special cautions with respect to such offerings in Idaho. Transferability of credit to the home campus of the parent

institution as well as to other comparable Idaho degree programs is also given specific attention.

The state's monitoring requirements were adapted from a 1977 document of the Council of Graduate Schools in the United States, entitled Non-Residential Graduate Degree Programs: A Policy Statement.

Military Base Programs

Out-of-state institutions are exempt from compliance with the Idaho code regulating educational programs brought into the state if their programs are offered solely for military personnel on a United States military installation.

MONTANA

Off-Campus Programs

Legislation enacted by the State of Montana is intended to give the Department of Commerce Regulation greater control over the operation of out-of-state postsecondary educational institutions. These institutions are defined in the legislation as proprietary and monitoring requirements are specified for their off-campus programs (Quadrant C - PROG IN). Specifically excluded from the definition are institutions publicly established and maintained by the government of Montana or any other state or by the federal government. Institutions which have regional or national accreditation are exempt from the provisions of this legislation. Although the legislation's intent statement refers to out-of-state institutions, in fact its definition of "agent" broadens the reference to include the state's own proprietary institutions. Thus, the monitoring requirements seem to pertain particularly to Quadrant C - PROG IN locations but may also cover Quadrant A - BOTH IN locations.

Application for both initial and renewal licensure requires submission of detailed information about items such as enrollment contract forms; tuition and tuition refund schedules; catalogs and circulars; financial references (including at least one from the institution's major bank); and a completed personal data form, as prescribed by the Department, for each director, administrator, supervisor, teacher, and agent. The legislation also includes considerable detail about teaching load; facilities and equipment; maintenance of

permanent records; and prohibition on guarantees of placement for graduates. Fees and surety bonds are also stipulated.

NEVADA

Off-Campus Programs

Each of the six campuses of the University of Nevada offers instruction off-campus, and some of the state's community colleges offer full programs away from the central campus. These (Quadrant A - BOTH IN) off-campus offerings are regulated by the parent institutions; the state imposes no monitoring requirements for the off-campus programs of public institutions.

The operations of nonexempt private Nevada institutions (Quadrant A - BOTH IN), and those of nonexempt out-of-state institutions bringing postsecondary programs into Nevada (Quadrant C - PROG IN) are subject to regulation under the Postsecondary Educational Authorization Act. Nevada's public institutions are exempt from provisions of the Act. Any institution which is accredited by a regional, national, or specialized agency recognized by the U.S. Office of Education may be regarded as meeting the minimum standards prescribed under the law. To have its accreditation accepted, however, the institution must submit to the Commission on Postsecondary Education the criteria used by the agency in its evaluation. If the institution as a whole is not accredited, the accrediting agency must indicate to the Commission which courses of study are accredited.

The Commission is charged with licensing and monitoring private postsecondary institutions operating in the state, whether domiciled in Nevada or elsewhere. These operations must comply with specified minimum standards, some of which focus on: the contribution of course

content and quality to achievement of course objectives; adequacy of space, equipment, instructional materials and personnel; education and experience qualifications of directors, administrators, supervisors, and instructors; provision of catalog and other materials describing programs offered, program objectives, length of program, schedule of tuition and other charges, cancellation and refund policies, and other facts likely to affect the student's decision to enroll; educational credentials given at satisfactory completion of training; maintenance of adequate records and standards; compliance with health and safety laws; financial soundness; absence of misleading or unfair practices; personnel of good character; and safe and adequate housing, if such is arranged by the institution.

Provision is also made for an agent's permit and a surety bond. Each applicant for a license must furnish a description of each course of study leading to an academic, professional, or vocational goal. This description must be submitted on Commission forms and must cover: the overall organization of the program; its goal; each educational unit, including its measurable objectives and the procedure for their evaluation; and the basic texts and instructional equipment to be used. Adding or significantly revising a course of study requires that a description of the change be submitted.

New institutions are granted a provisional license for not more than six months for the purpose of demonstrating compliance. The administrator for the Commission visits the institution before expiration of the provisional license. A license is granted for a period not to exceed two years.

OREGON

Off-Campus Programs

Oregon has off-campus monitoring requirements for both Quadrant A - BOTH IN and Quadrant C - PROG IN locations; that is, for all locations within Oregon, whether sponsored by institutions from within or outside of the state. Basically, two processes are involved: (1) review of new programs and program locations, whether or not the work leads to a degree; and (2) review of degree programs. With respect to the first process, any institution undertaking a new program must have the approval of the Oregon Educational Coordinating Commission, which bases its decision on an evaluation of the need for the program, its fiscal impact, and the extent to which it may duplicate existing programs. The second process, which focuses on degree-granting approval, applies to most institutions not accredited by the regional accrediting association.

For the first process, it is assumed that, at the institutional level, faculty, students, administrators, advisory boards, interested groups, and the public will all be involved, as appropriate, in developing proposals for new programs. Common categories of necessary information include: description and objectives; community and societal needs; duplication and impact on other institutions or segments; and fiscal impact and priorities. Independent institutions submit their proposals directly to the Coordinating Commission, whereas public institutions must first submit their proposals to the appropriate state-level board. In its review, the Commission may involve outside consultants or interinstitutional and intersegmental

bodies. Detailed but separate information guidelines are provided for review of new programs sponsored by community colleges and those developed under the auspices of public or independent four-year institutions. Still other information guidelines are provided for review of new locations. Again the general format of description of (a) objectives, (b) need, (c) duplication of effort, and (d) fiscal impact is followed. After specified review procedures have been completed, the Commission exercises final authority for approval or disapproval of a new program or program location.

All out-of-state institutions (Quadrant C - PROG IN) and certain Oregon private institutions (Quadrant A - BOTH IN) must obtain the Commission's approval for each degree program at each proposed location. Exempt from these provisions are Oregon public institutions, Oregon private institutions which are members of the regional accrediting association, and those Oregon institutions which have conferred degrees since 1920. Institutions required to file with the Commission for degree-granting authority must give considerable detail on the application form: for example, information about objectives, curriculum and academic standards, administration, faculty, student recruitment, financial condition, physical plant and equipment, library resources, entrance requirements, student credentials and records, advertising, policies about credit for prior learning, requirements for degrees, and refund policy. The Commission may send a representative or a committee for an evaluation site visit. In lieu of a review, the Commission may acknowledge the adequacy of accreditation by a regional, national, or specialized accrediting association recognized by the U.S. Department of Education.

UTAH

Off-Campus Programs

At present, Utah appears to be as much concerned about implementing a master plan for lifelong learning that will better serve the state's residents as with developing monitoring requirements for new or existing programs occurring beyond the main campus of the parent institution. As noted in a letter from a state official, "Collaboration and information sharing are the bywords for competing in-state institutions." Existing policy holds that all new off-campus degree and certificate programs offered by institutions in the Utah System of Higher Education (Quadrant A - BOTH IN) must receive prior approval from the State Board of Regents. Utah's independent institutions sponsor off-campus programs both within and beyond the state borders, but at present no monitoring requirements apply to these operations. Stressed in correspondence was the fact that the various institutions play different academic roles, with some having statewide assignments in given fields. The Commissioner's office anticipates passage in the near future of a private school bill which may contain a provision that out-of-state institutions (Quadrant C - PROG IN) register in advance their intention to offer off-campus programs in Utah.

WASHINGTON

Off-Campus Programs

The state of Washington has also been giving attention to off-campus instruction, but as in Utah, the emphasis is on making this kind of education available rather than on imposing requirements for what exists or is proposed. Any Washington institution which initiates a proposal for a new off-campus program must conduct a needs assessment. The importance of cooperation between public and independent institutions, whether through contractual or other arrangements, is stressed. The 1981 revision of guidelines for the coordination of off-campus instruction in the state indicates that the role of the Council for Postsecondary Education should continue to be coordinative rather than regulative. Coordinating policies provide definitions of service areas and related responsibilities for off-campus offerings of the several types of publicly supported institutions in Washington. Self-sustaining courses need not be limited by regional service area boundaries, but for such courses a courtesy advance notification procedure applies. The sponsoring institution for self-sustaining courses must provide reasonable advance notification to local private and public institutions, including community colleges.

For state-supported off-campus programs, the advance notification procedures are more complex. The sponsoring institution must complete a needs assessment and share the results with other interested institutions and with the Council on Postsecondary Education. The parent institution must assume the burden of proof of need and non-duplication. Advance notification to other nearby institutions and the

Council must include a description of program requirements, courses to be offered, and identification of the site or sites. Notified institutions have fifteen working days in which to file an objection, along with supporting evidence that the new program would be duplicative of one already in operation. If the two institutions cannot reach an accommodation, the Council may act as mediator. The Council will maintain an inventory of off-campus programs and courses, including offerings in both the public and private sectors.

In summary, Washington's monitoring requirements for off-campus programs apply only to Quadrant A - BOTH IN locations (in-state parent institutions offering off-campus instruction at in-state locations). Published documents make no mention of requirements for out-of-state parent institutions which wish to bring instructional programs into the state (Quadrant C - PROG IN). Thus, the state is not concerned with regulation so much as with allocating its limited postsecondary funds in a way that will best serve the state's residents.

Military Base Programs

This state's publications comment on military base education (both within and outside of the state), but the emphasis is on the state's role, if any, in supporting such offerings rather than on any monitoring requirements for these programs. In reviewing community college courses offered at overseas military bases, the legislature enacted legislation which provides that the costs of funding programs for United States military personnel and their dependents at any geographical location (Quadrant A - BOTH IN or Quadrant B - INST IN) shall ultimately be borne by grants or fees derived from non-state-treasury sources.

Chapter 6

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS AND THE STATES WITHIN THE REGION

Overview

This Association has two commissions; the Commission on Colleges accredits postsecondary, degree granting institutions, while the Commission on Occupational Education Institutions accredits non-degree-granting institutions. States within this region include Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia.

This Commission on Colleges has been involved in an in-depth study of its institutions' off-campus programs, and during the past year has intensified its efforts to monitor them. A prospectus is required for all new sites where degrees can be earned, or 50 percent or more of the coursework toward a degree will be offered. Included are all study abroad programs, those on military bases, independent study and correspondence programs, external degree programs, and those delivered by teleconferencing, videotape or newsprint, and those that involve contractual arrangements for the delivery of courses. The prospectus required is very detailed and specific; for example, faculty characteristics must be described in detail on the roster form provided. The organization's Standards are also undergoing revision; they were presented to the College Delegate Assembly in December, 1983.

The Delegate Assembly of the Commission on Occupational Education Institutions has developed a series of Standards and Statements which

constitute policy interpretations. One of the Statements addresses off-campus educational activities. Presumably these policies pertain primarily to Quadrant A - BOTH IN locations. There is no specific mention of military base or study abroad programs, nor of those which might be brought into the region from other areas (Quadrant C - PROG IN).

While there are some provisions for exemption, by and large these states monitor both the off-campus programs of both in-state (Quadrant A - BOTH IN) and out-of-state (Quadrant C - PROG IN) institutions. Accreditation is the most common type of exemption specified. About half of the states require evidence of need for the off-campus program, but in Virginia the law specifically prohibits its consideration. Many of these states cite the requirement of periodic review, and a site visit is specified for several of them. Both library resources and student services are concerns in most of these states. Although military base education is occasionally mentioned, it may be to note its exemption from state oversight. Study abroad is mentioned by one state, in the context of appropriate expenditures for it.

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

COMMISSION ON COLLEGES

COMMISSION ON OCCUPATIONAL EDUCATION INSTITUTIONS

Commission on Colleges

Off-Campus Programs

The College Delegate Assembly of the Southern Association of Colleges and Schools has developed eleven Standards which apply to initial applications, to member institutions, and to the institutional self-study program. Compliance with each Standard is necessary for accreditation, but the Commission on Colleges is ultimately concerned with the total institution, and the assessment of this totality is paramount in its decision to confer or retain membership. The current Standard Nine is concerned with special activities, defined as special degree programs, off-campus classes and units, independent study programs including correspondence and home study, conferences and institutes including short courses and workshops, foreign travel and study, media instruction including radio and television, on-campus programs including special summer sessions and special evening classes, and other such activities which may be developed by the institution within the framework of this Standard.

Provisions for special activities should include an adequate administrative organization, a sound financial base, a competent faculty, and sufficient and adequate facilities for the program offered. Notice should be given to the Commission 90 days in advance. Credit regulations for the special activities programs should be consonant with those of the total institution.

The Executive Council of this Commission has further elaborated the special activities listed in Standard Nine to include operationally separate units, extension programs, military base programs, external and off-campus degree programs, off-campus classes and units, weekend "colleges," study abroad programs, correspondence and independent study programs, and contractual arrangements. The Commission has outlined procedures to be followed with these types of programs. All off-campus programs (Quadrant A - BOTH IN) are to be included in the institutional self-study. New off-campus programs developed after the institution's regular review are to be dealt with on an individual basis. The executive director of the Commission must be notified in advance of the proposed program, and a preliminary advisory review by the Commission arranged. A detailed prospectus on the program is to be submitted, including documented authorization of the program by the appropriate bodies, such as the board, academic committees, and faculty. Authorization must be received from the Commission before the program can begin. There is usually an evaluation of the program by the Commission after the program has been in operation at least one year, and an annual report on all off-campus programs must be provided in the institutional profile.

Establishment of a special off-campus unit such as a center or a regional campus should be considered when a program grows to the extent that it is offering a comprehensive academic program to a specific student body. In turn, when such a center or regional campus develops independence and becomes degree granting, the institution may wish to seek accreditation for the unit as a separate entity. When an institution wishes to establish new off-campus classes, units, or

centers, the prospectus to be submitted should include items such as a description of the program and its relation to institutional purpose; a rationale of the need for the program; a curriculum outline and list of proposed courses; identification of the existence on campus of a discipline base for the program; projected budget and costs; evidence of adequate fiscal resources; identification of other resources such as library and similar learning resources, and physical facilities; identification of available faculty from the parent campus, of adjuncts, and of new full-time personnel; development of admission and graduation procedures and evaluation procedures; and identification of student services and their delivery systems.

The Southern Commission on Colleges has been involved in an in-depth study of their institutions' off-campus programs. Institutions have completed extensive inventories of the programs and resources at off-campus centers, branch campuses, and regional campuses, as well as of external degree and nontraditional study programs. As one example, institutions were asked to furnish a roster of instructional staff for the off-campus unit, listing all faculty by name, rank, most advanced degree, years of advanced work beyond the master's, other department in which the person teaches, employment outside of this institution for which compensation is received, and teaching load in clock hours per week. Site visits have also been carried out at selected locations. The Commission's purpose in seeking all of this information was to further its understanding of the focus and characteristics of an institution's off-campus degree programs.

For the past year this Commission has intensified its efforts to monitor off-campus programs. New policies and procedures now require a prospectus for all new sites where degrees can be earned or 50

percent or more of the coursework toward a degree will be offered. Included are all study abroad programs as well as those on military bases, independent study and correspondence programs, external degree programs, those delivered via teleconferencing, videotape or newsprint, and those that involve contractual arrangements for the delivery of courses by any organization not accredited by the Southern Association. Programs not so reported by member institutions may not be included as part of the overall institutional accreditation, and the institution's accreditation could be jeopardized by failure to report such new programs in a timely fashion. To initiate such a program, a prospectus must be provided to the Commission at least 90 days in advance of the admission of students, and approval must be received from the Commission prior to their admission. At an already existing off-campus location, new programs which involve a different degree level or a substantive change from majors already approved must also be reported.

Prospectus guidelines outlined in "Policies and Procedures for Initiating Off-Campus and Other Special Educational Programs" were approved in March, 1983. They are detailed and specific. As three examples, (1) documentation must demonstrate that an off-campus program is legally authorized to operate within the state where its site is located, and other documentation must show authorization for the program from appropriate decision points within the institution; (2) the faculty must be described in detail on the roster form provided, and information as to how off-campus faculty participate in the development of institutional policies and procedures must be provided; (3) a description of library resources to support the program must include

(if appropriate) the contractual and interlibrary arrangements with local or other libraries.

The Standards of the College Delegate Assembly are also undergoing revisions, which will be presented to the College Delegate Assembly for adoption in December, 1983. Continuing education, extension, and other special educational activities, including off-campus and study abroad programs and those on military bases, are now to be included under Section 4.3 of the new Criteria for Accreditation. For detailed requirements, this proposed manual refers the reader to the just noted "Policies and Procedures for Initiating Off-Campus and Other Special Educational Programs."

Military Base and Study Abroad Programs

Most of the Southern Commission on Colleges monitoring requirements pertain to Quadrant A - BOTH IN locations, where both the instructional site and the parent institution are within the region. The study abroad programs (Quadrant B - INST IN) involve the region's own institutions, with the instruction taking place overseas. The Commission has not published monitoring guidelines for an institution which brings programs into the Southern region from other regions (Quadrant C - PROG IN). While military base and study abroad programs are noted in Standard Nine as examples of special activities, neither is subject to specific monitoring requirements. They are, however, specifically referenced in the new "Policies and Procedures" document which gives the operating guidelines for this Standard (proposed as Section 4.3) in the Southern Association's new Criteria for Accreditation. As noted earlier, these criteria were scheduled for presentation for adoption by the College Delegate Assembly for December, 1983.

Commission on Occupational Education

Off-Campus Programs

The Commission on Occupational Education Institutions accredits non-degree institutions of occupational education providing educational or skill development experiences at less than the baccalaureate level. The Delegate Assembly of this Commission has developed a series of 12 accreditation Standards, and another 16 Statements which constitute policy interpretations. Statement 6 pertains to Accrediting Policy Relative to Off-Campus Educational Activities.

Plans for off-campus educational activities must be submitted to the Commission at least 90 days before such activities become operational. Data to be submitted include a statement of the nature and purposes of the activities, and basic planning docments pertaining to need for the activities; budget and financing information; governance and administrative organization; details of the planned educational activities; provisions for faculty, learning resources and facilities; legal authorization to conduct the activities; documentation of institutional arrangements; and publications announcing and/or describing the activities. Failure to comply may jeopardize the accreditation of the parent institution.

Following receipt of the requested information this Commission will consider both the projected activities and their potential impact on the whole institution. As soon as possible the Commission will notify the institution as to whether the planned activities are within the scope of its accreditation. A site visit or a complete reevaluation of the entire institution may be required by the Commission, and any costs are borne by the institution. Only after notification of

Commission approval may an institution consider the proposed activities to be within the scope of its institutional accreditation.

If the institution proceeds with the planned off-campus activities, a report must be sent to this Commission within three months of initiation. To be covered are the purposes and goals, and a preliminary assessment of governance and decision-making, faculty and instructional methods, fiscal and physical resources, curriculum and modes of evaluation, student services, and achievement of educational objectives.

This Commission decides on the definition of the off-campus unit before it is operational. The three choices are extension facilities, branch campus, or operationally separate unit. Extension facilities are totally under the administration and services of the main campus. The branch campus is capable of fulfilling the objectives of students under the direct administration of the main campus. It may not issue a separate catalog, but may supplement the parent school's catalog in addition to its own listing in the main campus publication. Both extension facilities and the branch campus are considered as part of the parent campus for accreditation. The third type, the operationally separate unit, is legally separate from the parent institution, and must meet all accreditation standards as a separate free-standing institution.

Military Base and Study Abroad Programs

The Commission's standards and policy statements do not specifically include military base or study abroad programs, quite possibly because these member institutions do not offer such programs. From the definitions of extension facilities and the branch campus, it may

be assumed that the Commission's off-campus monitoring requirements pertain primarily to Quadrant A - BOTH IN locations. Also, there is no mention of monitoring guidelines for occupational programs which institutions from other regions might wish to bring into the Southern region (Quadrant C - PROG IN).

ALABAMA

Off-Campus Programs

The Alabama Commission on Higher Education is responsible for approving and regulating the off-campus programs offered by Alabama's public postsecondary institutions. The Private School Unit of the State Department of Education has statutory authority not only over private and proprietary institutions chartered in Alabama but also over out-of-state institutions offering programs within the state. The monitoring requirements of the two regulatory agencies will be considered separately.

When a public Alabama institution wishes to offer a course or program off-campus (Quadrant A - BOTH IN), documentation of need is the first requirement; if the proposed program is to be given within the vicinity of another public institution, approval will be granted only if the resident institution cannot or will not provide the needed service. At least half of the off-campus courses must be taught by full-time faculty, and in any case the qualifications for full- and part-time faculty must be comparable to those of their counterparts on the home campus. Scheduled and actual student contact hours per class and per term must be the same off- and on-campus. There must also be comparability of facilities and learning resources, including laboratory and library resources; of admission and program completion requirements; and of testing and counseling services. Adequate administrative/supervisory services must be provided. A proposal format is available, and deadlines for their submission to the Commission have been established. By legislative mandate (Act 79-461), several branches and centers of Alabama's public institutions are exempt from

review.

As indicated above, authority for Alabama private or proprietary institutions (Quadrant A - BOTH IN) or out-of-state institutions (Quadrant C - PROG IN) to offer programs beyond the parent campus comes from the Private School Unit of the State Department of Education. Certain types of institutions may file for an exemption from its rules and regulations. Alabama private institutions with national, regional, or specialized accreditation constitute one exempt category, but their accreditation status must be validated annually. In addition, fees are required prior to the issuance of a license and agent permits. Surety requirements may be excused when financial stability is established. No licensed public or private Alabama institutions may accept academic credits from a school which has not been licensed or exempted.

For initial licensure, schools domiciled outside Alabama will be requested to present their proposed instructional programs for review by mail or in person; there is also an annual renewal process. Minimum standards are listed; they focus on: purpose and objectives (stated in measurable terms); content, courses offered, and credentials of the educational program; organization, administration and fiscal responsibility; qualifications of instructional staff, administrators, and agents; instructional resources and materials; school policies, including those for tuition and fees and refunds; facilities; admission and student services; and catalogs and brochures.

Military Base Programs

Courses and programs on military bases are exempt from review by the Alabama Commission on Higher Education.

FLORIDA

Off-Campus Programs

Monitoring requirements for off-campus programs offered in Florida may be found in the state's legislation on nonpublic postsecondary institutions; these requirements pertain only to nonpublic Florida institutions which are not specifically excluded by the 1981 legislation (Quadrant A - BOTH IN). The exclusion list includes but is not limited to colleges provided, operated, and supported by the state of Florida or its political subdivisions or by the federal government; nonpublic accredited institutions (or those whose credits or degrees are acceptable under the three accredited institution provision), which have been chartered in Florida; and certain specified types of vocational, technical, trade, or business institutions.

Out-of-state institutions proposing to offer an instructional program in Florida (Quadrant C - PROG IN) are advised to obtain a corporate charter from the Secretary of State, or to register as a foreign corporation. Specified procedures lead toward licensure. Following the filing of an initial application and the required supplemental information, an official of the State Board of Independent Colleges and Universities or a consultant committee appointed by the Chairman of the Board will conduct a site visit. Based on evidence from these sources the Board decides whether the institution will be granted a temporary, provisional, or original license. Each type of license states specifically the degrees and programs the institution is authorized to offer and the period of time for which the nontransferable license is issued. Various kinds of notarized information and documentation must accompany institutional applications for licensure.

The minimum standards specified in the legislation focus on purpose; administrative organization; educational program and curricula; finances; faculty; library; student personnel services; physical plant and facilities; and publications. If the applicant institution does not have accredited status (or the alternate three-letter provision), this fact must be prominently noted in the program's publications. Each licensed program is subject to annual review and license renewal; a site visit is required at least once during each five-year period. An institution wishing to expand its degree program(s) must file an amendment to its application; in fact, notice of any substantive change must be filed with the board within thirty days of implementation. Designating a resident agent is requisite to receiving applicant status or licensure. Requirements for agents and information about license fees may also be found in the published regulations.

GEORGIA

Off-Campus Programs

Monitoring requirements for off-campus programs in this state focus on three kinds of offerings: (1) those of the state's university system; (2) those sponsored by in-state as well as out-of-state private institutions; and (3) those designated as "nontraditional."

Institutions within the University System are authorized to explore the possibility of off-campus course offerings within the state (Quadrant A - BOTH IN). According to the System's policy statement, however, in most cases it is desirable to have the closest qualified institution respond to off-campus credit course needs. Policies have been developed to pursue this intent. For example, the president of the institution proposing such offerings is required to submit written concurrence with the proposal of those University System presidents whose institutions are close to the proposed site. In the event of a stalemate, the matter is referred to the Chancellor's Office for resolution. The policy statement also discusses quality issues, such as the requirement for comparability with on-campus education, and the provision of syllabi and appropriate library and laboratory facilities.

The Postsecondary Educational Authorization Act (1978) gives the Georgia State Board of Education the authority and duty to issue licenses to both in-state (Quadrant A - BOTH IN) and out-of-state (Quadrant C - PROG IN) private colleges or univerities operating in the state. The Board publishes minimum standards for authorization to operate; they pertain to course or program objectives; space, equip-

ment, instructional materials and personnel; publications; financial soundness; student records and credentialing; student housing; and cancellation and refund policy. National or regional accreditation may be accepted by the Board as evidence of compliance with minimum standards. Various types of institutions including Georgia's public postsecondary institutions and its fully accredited liberal arts colleges and universities are exempt from provisions of this Act.

Another section of this legislation provides information and procedural details about the authorization of nontraditional programs (sponsored by individuals or by an established institution domiciled in Georgia or another state), and out-of-state programs (Quadrant C - PROG IN). The institution makes formal application on official forms provided by the coordinator of Private College Standards. Upon receipt of the forms, fees, assurances and attachments required of all applicants, the coordinator applies what are designated as "Part I Criteria." If the applicant institution successfully completes this phase, an application committee is formed to apply "Part II Criteria." Part I items include information about organization and administration; program requirements; curriculum; external program faculty; admission requirements; advertising and recruitment; supporting services; refund policy; financial resources; library; physical facilities; and institutional effectiveness. In addition to most of these items, Part II Criteria include program objectives and instruction. Out-of-state applicants are advised to plan for at least two trips to Georgia during the evaluation process. For most out-of-state and nontraditional programs, an on-site visit will be necessary. With the exception of the on-site observation, the evaluation of in-state

institutions, nontraditional or otherwise, is conducted in a similar manner. Out-of-state institutions are subject to the same requirements as similar programs in Georgia. Thus, in essence, monitoring requirements for these Quadrant A - BOTH IN and Quadrant C - PROG IN off-campus programs are the same.

Military Base Programs

Colleges operated or supported by the federal government are excluded from the state's 1981 licensing and regulation requirements; no reference is made, however, to programs offered by other institutions on military bases.

Programs operated on military installations are exempt from Georgia's authorization law, provided they were in existence prior to 1979. The addition of new programs by these sponsoring institutions, or the initiation of military base programs by other institutions, requires authorization to operate from the State Board of Education. Prerequisite to obtaining this authority is approval from the Department of Veteran Services.

KENTUCKY

Off-Campus Programs

In this state, nonpublic residential and out-of-state institutions or other agencies which award degrees or other statements of recognition indicating a collegiate level of attainment must have a license issued by the Council on Higher Education. Procedural steps toward obtaining a license include: initial contact, application, a site visit, and final evaluation. The application for licensure requires institutional information as well as Kentucky site information, if applicable, and program-related information. The latter category includes items such as program description (overall objectives, curriculum, admission requirements, a description of how the proposed program(s) relate to existing programs at the parent institution, if applicable); program justification (source of students, specific contribution of proposed program, a description of how the program relates to other programs in close proximity); personnel involved in the program; projected sources of estimated revenue and expenditures; facilities and equipment; and library/learning center resources.

Various documents must accompany the application, e.g., college charter, catalog, constitution, student enrollment application/contract, and documentation of accreditation, licensure, or approval as well as other documents, depending on the institution's situation.

All nonpublic, unaccredited residential and out-of-state institutions--public and private--must file the same application in order to be approved for offering instructional programs within the state (Quadrants A - BOTH IN and C - PROG IN). While licensure requirements

technically apply to all Kentucky nonpublic collegiate institutions, some are licensed if regional or specialized accreditation appropriate to the instructional program is maintained, and if specified documents are submitted. An annual reporting mechanism is used to monitor institutions until the license renewal date.

Through an evolutionary process, the Kentucky Council on Higher Education has developed a coordinating mechanism for all "extended campus" credit offerings by public institutions (Quadrant A - BOTH IN). Based on institutional missions, program offerings, and locations, each of the state's eight public institutions has been given responsibility for an extended campus coordinating district that consists of from four to twenty-seven counties. Off-campus offerings by private institutions are not covered by this mechanism, but interinstitutional cooperation is stressed by recognizing private institutions and all consortium arrangements (including military bases) as part of the overall mechanism. General as well as specific coordinating guidelines (for each degree levels) have been established. For example, subject to exceptions, community colleges are restricted to their home counties in offering off-campus instruction, while public universities are restricted from offering community college-type programs outside their home communities and may not offer lower-division instruction within 30 miles of a community college. Any exception to established guidelines must be justified annually.

LOUISIANA

Off-Campus Programs

To serve the dual purpose of contributing to the development of a statewide postsecondary education data base and of informing and protecting the state's education consumers, a 1976 Act of the Louisiana legislature requires all postsecondary degree-granting institutions operating in the state to register with the Board of Regents. This includes not only those public and private institutions domiciled in the state but also any out-of-state institutions operating within Louisiana. Thus, this requirement affects both Quadrant A - BOTH IN and Quadrant C - PROG IN locations. One question on the Board of Regents form provided for registration refers to states other than Louisiana in which the institution offers courses or programs; thus, responses to this query provide information on any Quadrant B - INST IN activities (out-of-state offerings sponsored by Louisiana's public and private institutions).

Other required registration information includes the name and address of the institution; the location of its main campus or office; the location of its Louisiana operation; the courses and kinds of degrees offered; the name of its chief administrative officer and the names and addresses of its board members; its library location and number of volumes; and its accreditation status. This information must be updated annually. Registration does not constitute state approval of the institution, and may not be used in any form of advertisement.

The state also has a set of mandatory guidelines for the conduct of off-campus activities by its public institutions. "Off-campus instructional activity" is defined as that which is conducted outside the institution's parish. The stated intent is to achieve greater efficiency and quality in off-campus education, while at the same time meeting the citizens' educational needs. The guidelines specify which public institutions may offer the several levels of instruction. For the conduct of off-campus activity at the lower undergraduate level, the guidelines statement includes a list of the parishes assigned to each institution. There are further guidelines: for general prerequisites to offering off-campus instruction; the selection of faculty; supportive services; accreditation requirements; and administration. Areas for the conduct of off-campus activities are defined, and provision for exceptions outlined. Other details include the funding formula for such courses, the possible sharing of faculty and facilities, and limitations on the offering of work by correspondence.

Military Base Programs

The terms of contracts or memoranda of agreement with the armed services are not affected by the state's mandatory guidelines for the conduct of off-campus activities. Suggested in future negotiations, however, is adherence to the spirit of the guidelines with regard to quality and economy in off-campus instruction. Attention is also called to guidelines from the Task Force on State, Institutional, and Federal Responsibilities in Providing Postsecondary Educational Opportunity to Service Personnel.

MISSISSIPPI

Off-Campus Programs

This state has a general category termed "special activities programs" which, for public institutions, includes not only off-campus courses and programs, but also on-campus programs offered in special summer sessions or special evening classes to serve the needs of the nontraditional, part-time student. General and specific policies have been promulgated to take into account the functions and responsibilities of all existing state-supported postsecondary institutions. Coordination is mandated to eliminate needless duplication. All special activities, as defined above, are subject to approval by the Board of Trustees of State Institutions of Higher Learning, and must be reported on the forms they provide.

To carry out its intent, the Board publishes both general and specific policies. For example, public universities may not offer freshman and sophomore courses for credit at off-campus locations; on the other hand, if a new degree-granting center for upper-level and graduate instruction is established, these facilities cannot be part of the public junior college system. An institution preparing to establish degree-granting off-campus centers must complete a needs assessment, project enrollment for the next five years, propose a budget indicating the sources of revenues, and inform the regional accrediting association of its plans. Limitations are placed on locating off-campus sites within specified distances from existing public institutions. The Board's specific guidelines for off-campus programs are quite detailed both in regard to policies and their

implementation. As examples, classes in degree-granting off-campus centers may be scheduled only in the afternoon or evening during the week, but at any time on weekends; in addition, degrees may be awarded for credits earned entirely at the center, but the student's permanent record must reflect this. Credit courses taught in off-campus locations other than degree-granting centers or resident centers must also be reported at stated intervals to the Board. The report must include such information as the amount and level of credit, description of the course, enrollees, name and qualifications of the instructor, and amount of pay received for the course. All of these monitoring requirements for the off-campus activities of public institutions apply to Quadrant A - BOTH IN locations: that is, to cases where both the parent institution and the instructional site are located in Mississippi.

Since 1972, all public and private colleges and universities not already authorized to grant degrees have had to obtain accreditation from the Commission on College Accreditation in order to award degrees. To offer instruction, solicit students, and award degrees or other evidence of achievement, an application for a certificate of registration is made in writing to the Commission on Proprietary Schools and Colleges on forms furnished by it. After determining that the applicant has the facilities, resources, and faculty to provide students with the kind of instruction it proposes to offer, the Mississippi Commission on School and College Registration may issue a certificate of registration to an applicant offering one or more courses of instruction. This certificate, which is valid for two years, covers only the institution, courses and location for which it was issued and must be prominently displayed on the institution's

premises. The Proprietary Commission also assigns registration numbers to all schools registered with it; this registration number must be displayed on all publications and advertisements bearing the name of the institution. The provisions of the legislation exempt the state's public institutions, but not its private colleges and universities which are accredited by the Mississippi Commission on College Accreditation. The legislation does not exempt proprietary schools, nor any out-of-state institutions which may sponsor offerings in Mississippi (Quadrant C - PROG IN). At this time, however, there appear to be no further monitoring requirements, beyond the registration process, for off-campus work offered by these types of institutions.

NORTH CAROLINA

Off-Campus Programs

Out-of-state institutions proposing to offer off-campus work within the borders of North Carolina must apply for a license to grant degrees in the same manner as in-state institutions applying for initial licensure in North Carolina. Both out-of-state and in-state institutions are judged against the same standards. The Board of Governors of the University of North Carolina is legally responsible for licensing nonpublic educational institutions to confer degrees. The rules and standards under which this responsibility is carried out are based on the legislative model proposed by the Education Commission of the States in 1973. These standards are intended to protect consumers and reputable existing institutions against the possibly damaging effects of "questionable educational enterprises." They require that institutions be chartered by the state, be in operation at least two years before granting degrees, offer programs of the quality and content advertised, and have the faculty and facilities necessary to implement the programs offered. These general requirements are detailed in the Board's sixteen minimum standards for licensure. Accreditation by an appropriate accrediting agency recognized by the U.S. Office of Education may be accepted by the Board as evidence of compliance with minimum standards.

Procedures are specified for institutions seeking an original regular license (either in-state private institutions or out-of-state institutions which are not exempt from presentation of direct evidence about minimum standard compliance). An institution must submit a

letter of formal application for licensure which is accompanied by evidence that the institution has achieved and will maintain minimum standards. If the institution uses accreditation as evidence of minimum standard compliance, a copy of the self-study must be included, along with copies of the analyses, findings, and recommendations of the accrediting agency. This documentation and other current statistical data are then reviewed to determine if the institution is ready for an examination visit. Following a visit, the team of examiners makes advisory recommendations to the President of the University of North Carolina regarding readiness for licensure.

North Carolina publications do not list monitoring requirements for programs offered off-campus within the state (Quadrant A - BOTH IN) by its public institutions. Private institutions in North Carolina must be licensed as detailed above. Private institutions offering off-campus work within the state (Quadrant A - BOTH IN), must provide: adequate classrooms, laboratory and library facilities, along with qualified administration, faculty and support staff at each branch or center. Monitoring requirements for out-of-state institutions (Quadrant C - PROG IN) are imbedded in the requirements for initial and renewal licensure to grant degrees.

SOUTH CAROLINA

Off-Campus Programs

The South Carolina Commission on Higher Education, which is a coordinating board, must approve any program offered at any location by any South Carolina public college (Quadrant A - BOTH IN). The Commission is also responsible for licensing any nonpublic degree-granting institution to operate in or award degrees in the state. This pertains to Quadrant A - BOTH IN locations for South Carolina institutions, and to Quadrant C - PROG IN locations for out-of-state institutions. Legislation which restructured the Commission in 1978 called for the development of a comprehensive state master plan. The plan was intended to focus primarily on the offerings, goals, and plans of the public institutions but also to consider the location, offerings, and objectives of privately supported postsecondary institutions. Monitoring requirements for off-campus programs operated by the state's public institutions are not specifically addressed in any of the state's publications received in response to this project's request. The Commission or the General Assembly must approve any new program, however, before it may be implemented by a public institution of higher learning. This applies to offerings at any campus or other location leading to the establishment of any degree level in a field not previously offered. In addition, approval is necessary to establish a new major or option, specialization, concentration or postgraduate residency within a currently authorized field where these operations will be publicized in any manner. A policy and procedures manual presents details about the steps leading toward new program

approval. It is within a policy environment stressing statewide coordination, then, that any public institutions's plans for establishing off-campus offerings are viewed.

South Carolina's regulations for licensing nonpublic educational institutions to confer degrees are based chiefly on model state legislation proposed by the Education Commission of the States in 1973. In essence, no nonpublic postsecondary institution established in South Carolina or elsewhere shall have authority to confer degrees unless it first secures a license from the State Commission on Higher Education. There are minimum standards for licensure, and specific evidence which reflects compliance with those minimum standards. National, regional, or specialized accreditation, or approval for teacher certification by the State Board of Education, is considered satisfactory evidence of compliance with minimum standards for South Carolina institutions, but not for out-of-state institutions.

The State Commission on Higher Education may issue a regular or provisional license. The former is valid for a five-year period, subject to renewal every five years and to the annual reporting of information as requested by the Commission on Higher Education. The report must specify the level of degrees which the institution is authorized to award, and include an amendment for any proposed change in degree level. The amendment's form will depend on whether the institution is using accreditation or teacher certification approval as evidence of compliance with minimum standards. Should the proposed off-campus offering be at the graduate level, it must meet all applicable minimum requirements for campus-based graduate programs, including comparability and quality of curricular content, faculty qualifications, and accessibility to appropriate library re-

sources. Additionally, guidelines concerning transfer of credit, credit by examination, and residency requirements, if any, should be established, and methods for evaluating student progress must be made explicit.

For out-of-state institutions, or those in-state institutions which do not use accreditation or approval for teacher certification as evidence of minimum standards, documentation of the following must accompany the application for licensure: information about purpose, organization and administration, educational program, financial resources, faculty, library, student services, facilities, special activities (such as off-campus classes and units), and graduate programs. The Commission's Executive Director reviews this information to determine if the institution is ready for an examination visit. An examining committee's recommendations for licensure are advisory to the Commission. To offer programs within the state, both non-public South Carolina institutions (Quadrant A - BOTH IN) and out-of-state institutions (Quadrant C - PROG IN) must have this licensure.

TENNESSEE

Off-Campus Programs

Tennesee's publications pertaining to monitoring requirements for off-campus instruction focus on (1) institutional relationships in this sphere among public institutions, and (2) rules and laws regulating degree-granting institutions of higher education unless they are exempt from such regulations. The exempt categories include all Tennessee public institutions, and accredited private institutions primarily based in Tennessee. Out-of-state institutions must meet the minimum requirements for nonexempt institutions if they are to be authorized to operate by the Tennessee Higher Education Commission.

Based on the results of an off-campus instruction study, the Commission has developed detailed policies for Tennessee public institutions. These policies are designed to facilitate the goal of making the highest quality of postsecondary education available and accessible, to assist institutions in eliminating unnecessary duplication of effort, and to foster cooperation. Attention is given to admission standards; faculty staffing patterns; administrative support; institutional role and scope; academic support; finance; definition and recommendations regarding unnecessary duplication; categories of off-campus instructional units; procedures for executing the off-campus policies; and procedures for executing these policies when private institutions are involved. With one exception all of these policies involve Quadrant A - BOTH IN locations. The exception involves Quadrant B - INST IN locations; the guidelines state that when Tennessee's public institutions offer off-campus programs outside the state,

these offerings should generate sufficient income from student fees and contract income to cover their expense. The guidelines add that public institutions should exercise caution about offering degree-credit instruction beyond the state boundaries.

To obtain authorization to operate from the Commission, out-of-state institutions (or nonexempt privately controlled in-state institutions) must demonstrate compliance with minimum standards as defined in the Postsecondary Education Authorization Act. These standards are related to purpose, administrative organization, educational program, financial resources, faculty, library, student services, and physical facilities. Special activities (defined to include off-campus classes and units in Tennessee) must be organized in such a way as to insure equal and consistent attention to quality in all functions of the institution.

A long section in the regulations gives details about standards required for the offering of work beyond the baccalaureate level. Institutions applying for authorization to operate must file a complete application at least four months prior to operation. At the same time, they must give information on procedures for determining program need; internal review and internal quality control of any offerings on or off of the primary campus; and document approval through the organizational structure for off-campus programs. The data required for this application fall into a total of sixteen areas, many with subsections. Provided that authorization is approved, it is valid for one year. The guidelines also list the items necessary for the annual application review. For out-of-state institutions with a physical presence in Tennessee these procedures are prerequisite to

operation at Quadrant C - PROG IN locations; in-state institutions require this Commission authorization for offering programs at Quadrant A - BOTH IN locations.

TEXAS

Off-Campus Programs

In considering off-campus programs, the Coordinating Board of the Texas College and University System differentiates between privately and publicly controlled colleges not only within the state but also outside of the state. For public institutions, the monitoring guidelines cover the procedures and criteria to be used in approving credit courses offered away from the main campus (by Texas four-year colleges and universities) or outside of the taxing district (by Texas community colleges). All such off-campus and out-of-district courses (Quadrant A - BOTH 1N) require Coordinating Board approval. Criteria have been developed for determining the need for such courses, as well as for selecting the appropriate institution to operate such offerings once a need has been established. Separate criteria are given for upper level and graduate off-campus courses, which are of two types: extension and resident. The former must be self-supporting. Both types must be so identified on the students' transcripts. Resident courses are those comparable to on-campus courses; they must meet all the standards that the institution requires of its on-campus courses offered to regularly enrolled students. Each January, the Commissioner initiates six regional conferences, at which those public and private senior institutions proposing to offer off-campus credit courses during the following year can develop specific coordination plans. Following these conferences, institutions submit their official requests for off-campus courses to the Commissioner for his approval or disapproval.

Criteria have also been established for out-of-district course offerings by community junior colleges, as well as for lower-division off-campus courses proposed by senior institutions. Approved out-of-district offerings may contribute to the establishment of a needed community junior college or, conversely, may fulfill the needs of the area so that an operationally separate college is not required. The lower-division off-campus resident credit courses offered by universities, and the out-of-district courses offered by community colleges, must be equal in quality to the same courses taught on-campus.

All courses taught out-of-state by Texas public institutions (Quadrant B - INST IN) must be approved by the Commissioner according to specified procedures and criteria.

Public out-of-state institutions must have the approval of the Coordinating Board before they can offer a course or program within the state (Quadrant C - PROG IN). Rules have been promulgated for qualifying such public institutions to offer courses in Texas; all such courses will be considered according to procedures developed for Texas institutions with respect to a particular level of off-campus offering.

The in-state operations of private institutions, whether domiciled in Texas or in another state, are also under the jurisdiction of the Coordinating Board. This set of rules and regulations does not apply to exempt institutions, a category which includes those institutions that are fully accredited by a recognized accrediting agency. On request, an exempt institution may be issued a certificate of authorization to grant degrees. Nonexempt private institutions must provide specified types of evidence to demonstrate their fitness to

operate. For such institutions, a certificate of authority to grant degrees is valid for a period of two years, and is renewable under specified conditions.

Study Abroad Programs

Self-supported courses for which no tax funds are necessary may be taught overseas (Quadrant B - INST IN) without the Commissioner's action. Approval for state-supported foreign credit courses will be granted to institutions whose guidelines meet a series of specified criteria, for example, that instruction be supervised by appropriate institutional personnel, and that no course may be scheduled outside the state except to utilize academic, cultural, or physical resources not available in Texas.

VIRGINIA

Off-Campus Programs

Regulations governing the approval of institutions to confer degrees, diplomas, and certificates in Virginia are coordinated by the Council of Higher Education.

Approval legislation and the Council's regulations concern two categories of institutions: Virginia-domiciled private institutions, and out-of-state public or private institutions. New in-state private institutions must submit specified items, including an appropriate certification of compliance, and any catalogs or relevant institutional publications. If the application is judged satisfactory, the Council grants authorization for the institution to enroll students and to use the term "college" or "university." Successful completion of other specified steps will lead to full approval after the institution is accredited by a recognized agency. The same procedure is followed by an existing in-state private institution wishing to confer degrees at a new degree level.

Out-of-state institutions wishing to offer degree programs in Virginia (Quadrant C - PROG IN) must submit somewhat different information items than those planning to offer only courses. The Council's guidelines are interspersed with application forms which are designed to elicit relevant information. For example, the certificate of compliance to be signed by the chief executive officer of the out-of-state institution wishing to offer a degree program includes assurances that any credit earned at the Virginia site can be transferred to the institution's main campus, and that the institution has been ap-

proved by its home state agency, if necessary, to offer courses or degree programs out-of-state. Out-of-state institutions must be accredited by a recognized accrediting agency prior to operating in Virginia.

All of Virginia's state supported institutions are exempt from provisions of these rules and regulations, but the Council does approve off-campus locations (Quadrant A - BOTH IN), and coordinates and monitors their off-campus offerings through a system of six regional consortia. For private Virginia institutions, there are no specific regulations with respect to off-campus offerings. In contrast with the situation in certain other states, the possibility of program duplication may not be taken into account when applications are being considered. In fact, the law explicitly states that "In considering an institution's application the Council shall not take into account duplication of effort by public and private institutions in the Commonwealth or other questions of need within the Commonwealth for degrees or programs of the kind for which approval is sought."

Chapter 7

WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES AND THE STATES AND OTHER JURISDICTIONS WITHIN THE WESTERN REGION

Overview

This association has two commissions, each relating to a particular level of higher education. They are the Accrediting Commission for Senior Colleges and Universities, and the Accrediting Commission for Community and Junior Colleges. Their purposes and procedures in the monitoring of off-campus programs have been essentially similar, although a recent change in WASC procedure in reaction to a new California law may result in some differences for the time being. The Western region includes the states of California and Hawaii, along with Guam, American Samoa, and the Trust Territory of the Pacific.

With the exception of California, none of these jurisdictions has monitoring requirements for off-campus programs. Programs of private institutions (Quadrant A - BOTH IN) and those from out-of-state (Quadrant C - PROG IN) are monitored there, while those of public in-state institutions are exempt.

California has been struggling to cope with quality control of questionable educational establishments, many of which advertise in national publications. Following studies of off-campus education, legislative attempts ensued to close the legal gaps which made it difficult to control programs sponsored by out-of-state institutions (Quadrant C - PROG IN). California state law now requires an out-of-state institution operating a degree program in the state to register with

the State Department of Education that it is either accredited by the Western Association or an appropriate national accrediting body, or is authorized or approved to offer degrees in the state by the State Office of Private Postsecondary Education.

WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

ACCREDITING COMMISSION FOR SENIOR COLLEGES AND UNIVERSITIES

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES

Senior College Commission

Off-Campus Programs

Much of their information on off-campus programs may be found under Standard 4.H, "Special Programs and Courses for Credit," of the Senior College Commission's most recent (1982) Handbook of Accreditation. The provisions of this Standard apply to all off-campus courses and courses for credit, including those at centers or satellite sites; certificate programs; external degree programs; military base programs; courses taught exclusively by special delivery systems such as computerized learning, newspaper, correspondence, television, video or audio tape, and other methods, both on- and off-campus; and all courses using special time frames outside the regular course offerings of the institution.

Changes defined as substantive are to be reported to the Commission for Senior Colleges and Universities (WASC) in advance of their implementation. Included in the list of substantive changes are the addition or elimination of a branch campus and significant increases or decreases in external degrees or off-campus programs or courses. Such changes refer to off-campus programs within the Western region (Quadrant A - BOTH IN). When an institution wishes to offer an off-campus credit program outside of the region (Quadrant B - INST IN), it is expected to file a Prior Notification Form with the Commission at least ninety days in advance, whereupon the Commission notifies affected regional commissions, and schedules a visit if necessary.

The Commission also provides guidelines for those of its institutions which enter into contractual relationships with unaccredited agencies or contractors. The operative principle here is that an accredited institution may not lend its accreditation so that such an organization can develop and market educational programs, but, on the other hand, may enter into relationships which will support and enhance the accredited institution's instructional programs.

The Commission stresses the fact that off-campus programs are an integral part of the sponsoring institution; therefore, their purposes must be consonant with those of the institution. Quality and fiscal control of a program are essential, as are adequate resources to maintain this quality. Some of the areas given attention under the Standard on Special Programs and Courses for Credit include: requirements for awarding credit and granting degrees; schedules that will assure students the opportunity to complete the entire program as announced; competence and credentials of faculty, and pay, benefits and workload for full- and part-time faculty and staff that are commensurate with those found on-campus; on-campus administrative and faculty participation in planning, approval, and on-going evaluation of programs and selection of faculty; provision as needed of learning resources, such as library facilities, computer terminals, laboratories, classrooms, equipment and facilities; sufficient financial resources; provision and announcement of student services; administration of programs under established institutional policies and procedures; maintenance in perpetuity of individual student records at the home campus; and full disclosure of all conditions governing the programs.

In 1981 the California legislature enacted Senate Bill 272 which required out-of-state institutions by July 1, 1983 to register with

the state that their California operations had been accredited by WASC or an appropriate national accrediting organization, or had been authorized or approved by the State Office of Private Postsecondary Education. To comply with this legislation, WASC was placed in the position of accrediting operations, rather than institutions per se.

To be eligible for WASC "accreditation of operations," the out-of-region postsecondary institution offering degrees anywhere within the WASC jurisdiction must (1) be accredited by the parent institution's own regional commission (and maintain that accreditation); and (2) meet WASC standards as noted in their Handbook of Accreditation. In addition, most or all of the work toward the degree must be undertaken in the WASC region. The Commission emphasizes the fact that in accrediting operations of out-of-region institutions, it is not conducting specialized program evaluation, nor is it replacing the accrediting work of other regional agencies.

A self-study and site visit are stipulated; home region representatives will be invited to serve on the visiting team. It may also be necessary for a visiting team to meet with home campus administrative officers and the board. A substantial processing fee is required, along with visiting team and staff traveling expenses, and a possible additional charge in the case of visits to several WASC sites. For successful applicants, WASC will accredit with a public listing in accreditation directories.

Military Base Programs

The monitoring requirements for military base programs set forth by this Commission conform essentially to those summarized in the

Middle States section of this volume; for the sake of brevity, they will not be repeated here.

Study Abroad Programs

This Commission's monitoring requirements for study abroad programs are also very similar to those presented earlier for Middle States institutions. The Commission's Standard on Travel-Study Courses concentrates on policies about the award of credit; such courses are to be approved and evaluated according to the same academic requirements as are the institution's other courses, either on- or off-campus.

Community and Junior College Commission

Off-Campus Programs

The Accrediting Commission for Community and Junior Colleges regards off-campus programs as integral parts of the institution. Their goals and objectives must be consonant with those of the parent institution, and it must maintain quality control over such programs, and provide appropriate resources to assure that quality.

The Commission's standards provide a model of good practice for its institutions, and serve as a basis for judgments on the part of the institutions, the evaluation teams, and the Commission. Standard 2F of the Commission's 1981 Handbook and Policy Manual discusses components related to off-campus educational programs.

Typically these components include: goals and objectives of off-campus programs and courses consonant with those of the parent institution; admission, retention, and certificate and degree requirements for off-campus programs qualitatively consistent with those at the main campus; administration under established institutional policies

and procedures, under the supervision of an administrator who is part of the institutional organization; involvement of on-campus faculty and administrators in the planning, approval, and on-going evaluation of off-campus programs and courses, and in the selection of instructors; qualifications of off-campus instructors commensurate with those for on-campus instructors; full disclosure of all conditions governing off-campus programs and courses in appropriate catalogs and announcements, including tuition and fee charges, refund policies, admission and academic requirements; and adequate supervision and staffing of work experience/cooperative education courses.

An accredited institution entering into a contractual relationship with a nonaccredited organization or person must retain educational and fiscal responsibility and control. Such relationships are discussed in Standard 2G. Faculty and administrative personnel from the accredited institution must provide regular supervision and evaluation of the contract program; details of the degrees, certificates and courses to be offered must be determined in advance of the parent institution's signing the contract; curricular requirements and educational resources must be consistent with those for comparable non-contract educational programs; and student services, including student records, rights, and grievance procedures must be governed by policies of the accredited institution. A detailed outline which may be followed by institutions planning contractual relationships with nonregionally accredited organizations is appended to the Commission's handbook.

Establishment of major off-campus units is regarded as "substantive change" by this Commission. An institution planning such a change is instructed to consult with the Commission's executive

director to assure an orderly transition. Such a change may involve a review of the parent institution's accreditation status.

Military Base Programs

The Commission's guidelines for postsecondary programs on military bases are essentially those which are described in detail in the section on monitoring requirements of the Middle States Association of Colleges and Schools; for this reason they will not be repeated here. These guidelines were adopted by this Commission in 1973, and revised in 1978.

Study Abroad Programs

The same standards required for on-campus courses must apply to programs conducted in a travel/study mode. Credit is to be awarded for educational achievement within program objectives, not for visits and tourist activities.

CALIFORNIA

In 1980 the California Postsecondary Education Commission published the results of a comprehensive study of California off-campus education which had been mandated by the Budget Act of 1978. This publication includes a history of the development of the off-campus movement across the country, and an extensive bibliography on the subject. In addition, the Commission has undertaken a comprehensive study of accreditation with the objectives of (1) describing the role of the accreditation process in California postsecondary education, and (2) discussing several areas of controversy concerning the accreditation process, with recommendations for addressing them. Since 1975 a number of related bills have been introduced into the California legislature, including the 1981 legislation discussed b low. Information generated by the Commission's study is expected to provide explicit policy guidelines at the state level.

The 1981 legislation (Senate Bill 272) made substantial changes in the 1977 Private Postsecondary Education Act, which specified the procedures whereby private institutions could secure authorization from the state to issue diplomas and degrees. Although this Act does not specifically address off-campus offerings, it is indirectly relevant since it regulates the activities of out-of-state institutions operating instructional programs at California locations (Quadrant C - PROG IN). Authorization for California-based institutions to operate programs within the state (Quadrant A - BOTH IN) are covered in this legislation, but there is no differentiation in regulations with

respect to educational offerings at off-campus sites as opposed to those on-campus. Publicly controlled postsecondary institutions are exempt from the provisions of this Act, but privately controlled institutions are not, with some limited exceptions.

In order to confer degrees, diplomas or certificates, an institution (unless specifically exempted) must meet the requirements of at least one of three alternatives. The first alternative is that the institution, program, or specific course of study upon which the degree is based be fully accredited (not have candidate or provisional status), and that its accreditation status be attested to annually through an affidavit. The second alternative is that the institution have the approval of the Superintendent of Public Instruction to award specific degrees; this approval (valid for a maximum period of three years) is dependent upon the institution's submission of detailed information, which is reviewed by a special evaluation committee, which then makes a recommendation for approval. The third alternative is that the institution file a series of specified affidavits with the Superintendent, which he or she must verify by impaneling a three-member team; authorization to operate, which may be granted for one year initially and for three years upon subsequent renewals, can be denied only if the affidavits are inaccurate. Institutions authorized to operate under this Act must demonstrate compliance with a specified set of minimum standards.

Out-of-state institutions wishing to operate in California (Quadrant C - PROG IN) must make application on forms provided by the Superintendent and must provide various kinds of documentation such as copies of a published or proposed catalog, promotional literature, and student enrollment agreements. The Act also sets forth a detailed

list of fees and charges to be paid by private institutions operating under this chapter of the Education Code, along with provisions for exemption.

Since July 1983, California legislation has required out-of-state institutions to register with the state that they have been accredited by the Western Association of Senior Colleges (WASC) or a COPA-recognized national accrediting body, or that they have been approved or authorized by the State Office of Private Postsecondary Education. Thus regionally accredited out-of-state institutions are in the position of seeking accreditation for operations located in California from the institutional accrediting body with jurisdiction over the instructional location, that is, the Western Association.

As of June 1983, just as the legislation became operational, the Western Association reported that six institutions had sought accreditation through WASC, while eight had filed for state authorization, and another seven had indicated their intention to cease operations in the state (Andersen, 1983, p. 1). A March 1984 draft document prepared by the California Postsecondary Education Commission presented an update of these earlier figures. The Commission reported that thirty-two out-of-state institutions had been operating programs in California in January, 1982. By March 1984, eleven had withdrawn; five were accredited by a national institutional accrediting body; ten applied for and were granted state authorization (the legislation does not provide for qualitative review of such applications); and six applied for WASC accreditation. Of these six applicants, five were accredited by WASC (California Postsecondary Education Commission, 1984, p. 43).

HAWAII

Off-Campus Programs

Hawaii has no regulations governing the operation of off-campus programs sponsored by either in-state or out-of-state parent institutions.

GUAM, AMERICAN SAMOA, AND THE TRUST TERRITORY OF THE PACIFIC

Both the University of Guam through its Center for Continuing Education, and the Guam Community College offer courses off-campus. In each case, however, these offerings are arranged under institutional auspices, with no external monitoring requirements. Likewise there are no monitoring requirements for the institution wishing to bring a program into Guam.

No information on monitoring requirements for off-campus programs was received from American Samoa.

No monitoring requirements for off-campus programs were reported for the Trust Territory of the Pacific. What has now become the College of Micronesia was operated under the auspices of the Trust Territory government, and administered with the assistance of the University of Hawaii. The present College of Micronesia Extension Centers provide courses for practicing teachers as well as for a range of other students; increasing emphasis on a multi-media approach is projected. Extension center staff are in the Marshall Islands, Kosrae, Ponape, Truk and Yap States of the Federated States of Micronesia, the Commonwealth of the Northern Marianas, and the Palua District. There appear to be no monitoring requirements for these off-campus programs, nor any for an outside institution wishing to offer coursework in the Trust Territory.

Chapter 8

NATIONAL INSTITUTIONAL ACCREDITING ASSOCIATIONS

Overview

Four institutional accrediting agencies are national in scope: the American Association of Bible Colleges, the Association of Independent Colleges and Schools, the National Association of Trade and Technical Schools, and the National Home Study Council.

Each of these organizations recognizes and exercises quality control over courses or programs which occur away from the main campus of its member institutions. Consumer protection is a concern of these agencies, although less so on the part of the association for Bible colleges. This may be related to the fact that the other three associations accredit substantial proportions of proprietary institutions as their members, and the public view, whether or not justified, is that more close scrutiny should be accorded profit-making enterprises.

The most thorough review of off-campus programs is required by the Association of Independent Colleges and Schools (AICS), the national organization for business schools. While the other three organizations are concerned along with AICS about academic, administrative, and financial matters, that agency is more specific about state authorization for the off-campus program, reason for the offering, learning resources, and information for the public. Facilities and equipment are important considerations, even for the Home Study group when some of the program is available at an on-site location. Periodic review of these programs is stated or implied, and site

visits are usual procedure. None of these organizations makes reference to military base or study abroad programs.

AMERICAN ASSOCIATION OF BIBLE COLLEGES

Off-Campus Programs

This association has issued policy statements pertaining both to correspondence studies and to extension programs. While recognizing that correspondence work can serve a genuine need within the Christian community, the Association states that residence study should play a major role in the Bible college program. Up to half of the credits for a baccalaureate degree may be earned through such an external program. Correspondence studies are to be included in institutional self-evaluation for accreditation. The criteria developed for correspondence studies emphasize maintenance of the same level of quality as characterizes similar on-campus offerings.

The Association recognizes two types of extension programs: the extension school and extension classes. The first is an operationally separate unit, which has its own intructional resources, campus, faculty, library and other resources, but which nevertheless comes under the control of a parent institution. The extension school cannot be regarded as accredited on the basis of the parent institution's accreditation but rather must be considered on its own merits. Extension classes are usually taught in local churches or rented quarters under direct control of the parent institution, its administration and faculty.

The initiation of an extension program is regarded as a substantive change; thus, it must be reported to the Association and included in the institution's periodic self-evaluation. The quality of such programs is to be commensurate with those of the parent institution;

and at the same time, such programs should not impose an undue burden on the resources of that institution. The curriculum of the extension programs should be consistent with its objectives, and there should be no proliferation in areas "not appropriate to the Bible college." Attention is also directed to the administrative organization, faculty, library, facilities, student services, and evaluation.

ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS

Off-Campus Programs

Within the past year, the Association's Accrediting Commission has implemented substantial revisions in its approach to the non-main-campus activities of its member institutions. Two kinds of off-campus arrangements are recognized by the Commission: (1) extensions and auxiliary activities, and (2) branch campuses. An assumption basic to the evaluation of off-campus activity involves the organization's stance with respect to ownership and management; it must be the same for the main campus and the branch campus. In fact, when applying for inclusion of a branch campus in the institution's accreditation, the chief administrative officer of the parent institution must certify that "there exist no management agreements, option agreements or other contractual agreements between the ownership of the main campus and other parties relative to the operation of this branch."

The Executive Director or the Executive Committee of the Accrediting Commission is empowered to include what are defined as extensions and auxiliary activities in the parent institution's accreditation, following review of specified information received from the institution. Submission of a preliminary information report and indicated exhibits is required; two such exhibits are evidence of state authority to operate the facility, and coverage of the facility in the institution's publications.

Depending on the Executive Director's decision based on the application materials received, a branch campus either may be included in the parent institution's accreditation for a period of up to fif-

teen months, prior to an on-site evaluation of the branch, or may be accredited only after a preliminary site visit. Even if the branch receives interim approval, a site visit to the branch is still required within twelve months, unless the parent institution is scheduled for a complete reevaluation within the fifteen-month period.

According to the Standards, an institution must file complete information about each branch campus with the Commission. A branch campus report, exhibits described on a checklist, and an application fee are required.

The branch campus report form includes questions about ownership and control; reasons for establishing the branch; distance from the main campus; number of classrooms; programs to be offered, and any differences in offerings betwen the branch and the main campus; enrollment; catalog; state authorization to operate; faculty, by name and degree; and administrators by name and position.

The checklist requires exhibits such as a catalog giving details about the branch's operations; an organization chart for the branch showing its relationship to the parent institution's administration; complete! data sheets for staff members; teaching schedule for the initial start of classes, including the instructor assigned to each class; an official transcript for each instructor; description of the physical facility; a copy of the facility's lease or deed; evidence of compliance with local health and safety codes; the curriculum for each program offered; an inventory of instructional equipment, on a form provided; an inventory of basic reference materials and plans for future library development; copies of enrollment agreements; and copies of all promotional materials.

Final inclusion of the branch within the parent institution's accreditation may be authorized only by the full Commission and following the stipulated site visit. All branches must also be visited during an institution's evaluation for continuing accreditation.

NATIONAL ASSOCIATION OF TRADE AND TECHNICAL SCHOOLS

Off-Campus Programs

The Association's Accrediting Commission is an independent unit with final authority to evaluate schools and to determine whether or not they meet the criteria and standards adopted by the Commission. Accreditation is institutional rather than programmatic. Accredited institutions must notify the Commission immediately of substantive changes, which include additions or major changes of courses or facilities. Inclusion of a separate facility within the accredited status of an institution becomes effective upon approval by the Commission. Although the Association's documents do not refer to off-campus offerings per se, they do give attention to such related matters as the establishment of separate classrooms, branches, and extensions, and the addition of new courses.

Recognition from the Commission may be sought for three types of separate facilities: separate classroom, branch, or extension. A separate classroom is supplemental training space located within ten miles of the main school, close enough to assure its immediate supervision. Its only required on-site service is teaching, but it is not limited to this service. A branch is an additional training facility within commuting distance, considered to be a radius of fifty miles. A facility beyond that distance is classified as an extension and may be eligible for classification as a school in its own right, unless it does not yet meet certain technical accrediting requirements. There is an on-site director. A school seeking to have any of these three types of separate facilities included within the accredited status of the parent institution submits specified documents to

this end. Final branch campus or extension approval requires a team visit and report.

Any course or program which is or could be offered at the main campus may also be offered at an off-campus site (separate classroom, branch, or extension). In addition, any other course or program leading to a trade or technical occupational objective may be offered at a branch or extension, regardless of whether it is offered at the main school. On the other hand, a branch or extension may offer a program not having a trade or technical objective only if the program is offered on the main campus and the predominant training of the branch or extension remains trade or technical. In general, students attending separate facilities are entitled to educational and student services equivalent to those available on the main campus. If such is not the case, they are to be informed, in writing and in advance of enrollment, about which services are available at the separate facility and which at the main campus.

The Commission also issues guidelines for the addition of new programs, but does not distinguish between those offered on the main campus and those offered at a separate facility. When a school merely adds a single subject to an existing program, no report to the Commission is necessary. However, addition of a new program (designated "course" in the Association's publications) constitutes a substantive change, which must be reported to the Commission. A nonrelated program requires further reports, and possibly a site visit.

Comprehensive forms are available from the Commission to guide the applicant institution through the steps necessary (including provision of information and documents) for initial accreditation, addition of separate facilities or courses, and annual reports.

NATIONAL HOME STUDY COUNCIL

By definition, all courses and programs offered by educational institutions accredited through the National Home Study Council occur away from the headquarters of the school. In fact, in Europe correspondence education is best known as "distance education." In that sense, all correspondence work toward credit or non-credit objectives may be regarded as taking place "off-campus." The Accrediting Commission of the Council, an organization independent of it, is recognized by both COPA and the U. S. Department of Education as the accrediting body for both private and non-private correspondence institutions. An institutional accrediting body, its scope is national, with a focus on the method of instruction. Degree, non-degree, vocational and avocational programs are covered by this home study school accreditation.

The Commission currently accredits approximately 75 home study schools, most of which are proprietary. About 20 percent of them are public or non-profit; the latter group includes, for example, the Extension Course Institute of the U. S. Air Force, with an enrollment of more than 400,000 students. The National Home Study Council's Directory of Accredited Home Study Schools includes 5 institutions at which an associate or a baccalaureate degree may be earned solely through correspondence work.

Bona fide correspondence institutions with two years' operating experience (beginning with the first enrollment) may apply for National Home Study Council accreditation. The Commission's standards for accreditation are concerned with: educational objectives; instructional

materials and methods; examination services; a qualified faculty; admissions; student progress; honesty in promotional materials; carefully selected, trained and supervised field representatives; adequate financial resources; a satisfactory tuition refund policy; maintenance of student records; and ethical operations. A set of business guidelines constitutes part of the Commission's accreditation standards. These business standards give attention to advertising and promotional literature; school and course recognition; student enrollment; and tuition, cancellation, and collection policies.

Applicant institutions prepare a self evaluation report based on a series of questions. The report for the Commission must be accompanied by review copies of each of the courses offered by the school. These are reviewed by subject matter specialists, along with texts, study guides, and any instructional aids. An examining committee then visits the school. If resident training is provided as part of the correspondence course, these facilities are also examined. In addition to these procedures, the Commission conducts a further survey to ascertain the reliability and reputation of the school. Representative agencies contacted include state departments of education, federal agencies, states attorneys general, and Better Business Bureaus; the purpose is to discover whether public needs are being served fairly. A random selection of students is surveyed by mail for their opinions of their educational experience.

The normal cycle for complete self-evaluation and examination by the Accrediting Commission occurs every five years. Special or periodic reports may be required of any accredited institution, however, and complete reexamination in less than five years may be indicated if there are management changes or serious problems.

In summary, the institutions accredited through the National Home Study Council offer programs through an instructional mode (correspondence) which occurs away from a main campus, but without the type of student-faculty interaction that off-campus work usually implies. Nevertheless, for the purposes of this publication, correspondence work may be regarded as a sub-set of off-campus activity.

PART III

MONITORING ROLES

Chapter 9

FINDINGS

Monitoring requirements stipulated for off-campus, military base and study abroad programs by the regional and national accrediting bodies and the state postsecondary agencies have been presented in Part II. In preparing the narratives for Chapters 2 through 8, the publications of these organizations, in addition to some correspondence, were used as major resources. Three frames of reference were employed for analysis of these requirements: the type of program, the location of the instructional program vis-a-vis the location of the sponsoring parent institution, and the major areas of concern specified by the monitoring requirements. The six questions posed in Chapter 1 of this volume relate to these three frames of reference; the study's findings will be organized around the six questions.

> Question 1: What are the differences and similarities in monitoring requirements among the nine regional and the four national accrediting commissions?

Certainly there are more similarities than differences. Publications of the six regional associations in general emphasize that the entire member institution is under consideration in the accreditation process, and that wherever the off-campus site, and whatever the format of the program, it is the parent institution's responsibility. The possible effects on the main campus of fielding an off-campus, military base or study abroad program are considered by these organizations, and there is concern that any off-campus programs should be

congruent with institutional mission and goals. It is necessary for the parent institution to include off-campus offerings in self-study documents, and they are subject to site visits, especially if they are within the state and region of the parent institution.

Regional associations require state authorization before an off-campus program can be initiated if that is state policy. Most of the regionals are not officially concerned with need for the program, nor with program duplication, although these questions may be asked informally when a program is being planned. Their most frequent concern is with academic matters. The regionals seek assurance that the quality of off-campus education is commensurate with that offered on the main campus. Administrative organization, finances, facilities and equipment, student services, learning resources, and catalogs and advertising also are customary focal points for questions posed by the regionals about off-campus programs. Most of the regionals' monitoring requirements are for off-campus programs sponsored by member institutions in their own region, that is, at Quadrant A - BOTH IN locations. Their documents do take note of out-of-region programs, but the monitoring tends to rely on cooperative arrangements between the "sending" and "receiving" regional organizations. The principle of parent institution responsibility for its own programs, wherever offered, is clear, but as a matter of courtesy the regional in the receiving location is invited to participate in any site visit. Which accrediting body ("sending" or "receiving") is to have primary responsibility for out-of-region programs is, in fact, a question currently under consideration in the accrediting community; it will be discussed later in this response to Question 1, and in Chapter 10.

The national accrediting organizations monitor member institutions' off-campus programs, but they do not have published guidelines for military base and study abroad programs, presumably because there has been no need for such monitoring among their respective clienteles. These organizations, like the regionals, look at off-campus programs in terms of their relation to and impact upon the entire institution. They are interested in academic and administrative concerns in particular, with somewhat less emphasis on ancillary support services than the regionals; this varies by national association, however. Site visits and periodic reviews are also a part of their oversight procedures.

The differences in monitoring requirements among the accrediting commissions may be due to differences in either philosophy of accreditation or in reaction time in response to external pressures. To illustrate, North Central's philosophy stresses the valuable educational resource provided by off-campus programs. This commission seeks to encourage responsible institutions rather than to impose prohibitive restrictions on all who would offer programs off-campus.

The Middle States Commission also emphasizes good practice, as indicated by its recently revised Characteristics of Excellence (1982), and its studies of military base and study abroad programs. Publications resulting from these on-site evaluations of programs offered in this country and around the world provide models of good practice for its member institutions and those in other regions as well.

The Southern Association has intensified its inquiry into the off-campus phenomenon, and as a result has developed a detailed set of questions which must be answered in considerable detail by insti-

tutions contemplating or continuing off-campus or other nontraditional programs. This approach will facilitate association oversight, but could raise the issue of institutional autonomy.

Because of state legislation and the possible spectre of state agency accreditation, the Western Association of Senior Colleges (WASC) has embarked on a new approach to monitoring Quadrant C - PROG IN programs, that is, those sponsored by out-of-region parent institutions. It has felt compelled by state legislation to consider for WASC accreditation any degree-granting operation within its jurisdiction which meets certain criteria, regardless of the parent institution's extraregional location. This new policy for Quadrant C - PROG IN operations, as well as the detailed oversight of nontraditional programs which has been initiated by other accrediting bodies, could be interpreted as responses to public statements calling for more attention to quality control of off-campus programs.

> Question 2: What are the differences and similarities in monitoring requirements between the accrediting groups and the states? More specifically, what is the overlap or duplication in monitoring requirements, and what are the consequences?

Beginning with the last part of the question, the answer is clear: overlap in stated requirements is the most striking finding in this study. At the same time it must be noted that many states exempt one or another class of institution, and the most usual basis for this exemption is the regional or national, and sometimes the specialized accreditation of the parent institution. A number of states also require accreditation as a condition of bringing a program sponsored by an out-of-state institution into their state.

For institutions which are not exempt in accordance with the particular state's policies, the complexity of the approval process for off-campus programs, even for in-state parent institutions, may raise questions of institutional autonomy. A number of states openly require in-state, but particularly out-of-state, schools to provide evidence that the new program is both needed and that the need cannot be met by a local institution. Questions of institutional protectionism and indeed restraint of trade may thus be raised. Consumer protection permeates states monitoring requirements, in part the result of the 1973 model legislation on state licensure developed by the Education Commission of the States. This emphasis is present but less apparent in the requirements of the nongovernmental accrediting organizations.

An interesting contrast occurs between the regional bodies and the state agencies with regard to emphasis on monitoring requirements for the respective quadrants. As for the regional groups, all of them have requirements for Quadrant A - BOTH IN locations. They also hold their parent institutions responsible for programs wherever they may be offered, thus including Quadrant B - INST IN locations. The regional groups' oversight of Quadrant C - PROG IN locations emphasizes cooperation between the "sending" and the "receiving" accrediting organizations, but although there are new developments in the Western region, the primary responsibility clearly lies with the "sending" regional, although it may be a continent away.

The states as a group give more attention to Quadrant C - PROG IN than to Quadrant A - BOTH IN locations. About half of the jurisdictions have requirements for in-state parent schools (Quadrant A - BOTH IN), although there are various categories of exempt institutions. In

comparison, some two-thirds of the jurisdictions have monitoring requirements for the off-campus offerings of out-of-state parent institutions (Quadrant C - PROG IN).

In summary, the regional groups tend to concentrate on the offerings of their own institutions, which are usually at Quadrant A BOTH - IN locations, while the states are somewhat more concerned with the programs of out-of-state institutions. Both institutional protection and consumer protection appear to provide motivation for these state statutes.

Another contrast in the monitoring of accrediting bodies and the states is the extent to which their requirements apply to institutions under public as compared with private control. With respect to accrediting associations, their requirements apply equally to all member schools, regardless of type of control. With respect to the states, their requirements for Quadrant A - BOTH IN locations more often apply to public institutions, in order to coordinate state-wide offerings, and may specifically exempt private institutions. In some states, however, the situation is just the reverse, with public institutions being exempt from state monitoring requirements. In comparison with this situation for the programs of in-state parent institutions, all out-of-state schools bringing programs into the state (Quadrant C - PROG IN) are apt to be treated as one category for this purpose, whether the parent institution is under public or private control.

Some of the possible overlap in accrediting body and state monitoring requirements does not actually occur because state agencies may not choose to exercise some powers granted to them, or because a number of states exempt parent institutions on the basis of their

accredited status. To the extent that there is actual overlap in accrediting body and state monitoring requirements, however, this constitutes wasteful duplication of effort, for the institutions, and for the accrediting bodies and the states as well.

Question 3: What are the similarities and differences in monitoring requirements between the regional commission(s) and the states comprising that region?

In each of the six regions there is a certain amount of creative tension between the regional association and the state agencies within that region which are responsible for postsecondary education. This may be reflected in the increasing complexity of monitoring requirements to which parent institutions are subjected by the states in one region, and by the regional organization in another region. Perhaps the scenario goes something like this: if the state questions the regional's ability to enforce quality control for off-campus programs, the state may compensate by increasing its own monitoring. If the regional is defensive about being viewed as "too soft," it may become more restrictive. In either case, it is the parent institution which is subject to more strict monitoring, some will say for a good purpose, while others will point to a loss of institutional autonomy.

Overall, evidence is lacking that would indicate a direct interactive relation between the monitoring requirements of the regional and those of its constituent states. It is not that simple. For example, whether the state agency has coordinating or regulatory powers, and for public or private or both types of institutions, may be more important variables than the stance of the regional association on monitoring off-campus education.

> Question 4: What are the differences and similarities in monitoring requirements among the three types of programs: generic off-campus, military base, and study abroad?

As might be expected, by far the largest proportion of monitoring requirements pertain to off-campus programs. Military base requirements, while far fewer, still outnumber those for study abroad programs. In general, the regionals see all three types of programs as extensions of the parent institution, which in turn must be accountable for them at any location, in any form.

Although a number of states as well as the regional organizations mention military base programs, such programs tend to be exempt from state regulations. For military base as well as study abroad programs, several of the regional groups use basically common monitoring items.

> Question 5: What are the differences and similarities in monitoring requirements for instructional locations outside of the parent institution's region (or state) as compared with those for instructional locations inside of the region (or state)? More specifically, are the monitoring requirements more stringent for off-campus programs sponsored by out-of-state or out-of-region institutions?

The concept of "quadrants" applies equally to the region or the state, but their monitoring requirements for out-of-area parent institutions show distinct differences.

Beginning with the regional situation, to date the accrediting bodies have devoted more attention to the off-campus programs of their own parent institutions (Quadrant A - BOTH IN) than they have to those brought into the area by out-of-region parent institutions (Quadrant C - PROG IN). According to generally accepted practice, Quadrant C - PROG IN offerings are the specific concern of the out-of-region parent

institution, although the "resident" regional organization will be invited to cooperate in any site visit arranged by the parent institution's accrediting body. That generally accepted practice may be changing, however, since the Western Association, as a response to state legislation, now will consider granting its own accreditation to out-of-region operations planning to locate anywhere in the Western region. Nevertheless, as of now the resident regional bodies give more attention to Quadrant A - BOTH IN programs of their in-region parent schools than they do to the Quadrant C - PROG IN offerings of out-of-region institutions.

In comparison with the regional situation, the states appear to be more concerned with off-campus programs brought into the state than they are with those sponsored by the state's own institutions. To begin with, state monitoring requirements for out-of-state institutions usually reflect consumer protection principles, in many cases attesting to the use of model licensure legislation developed by the Education Commission of the States (1973). In addition, however, requirements which have the effect of protecting local institutions are not uncommon. For example, some states treat out-of-state institutions requesting permission to bring in a single program just as they would their own in-state institutions planning to establish an entire college. This may require resources of time and money beyond that which these institutions can afford, particularly those schools that wish to establish multiple sites, possibly in multiple states. On the other hand, legitimate questions may be raised about the reasons an institution wishes to field a program in another state. One issue voiced is whether it is appropriate for the state

to assume the role of protector for in-state institutions, perhaps at the expense of effective and efficient education for some of its citizens. This may translate into a question of protection for the consumer vs. protection for the in-state institution. The assumption is that they are coterminous, but not all would agree.

As noted earlier, somewhat fewer states have Quadrant A - BOTH IN monitoring requirements (for in-state parent institutions) than have Quadrant C - PROG IN requirements (for out-of-state institutions). An added difference comes in the actual exposure to these regulations, however, which is less customary for Quadrant A - BOTH IN locations because of exemption policies. That is, in-state institutions appear to have more possibilities for exemption from state requirements, even if the state regulations apply equally to in-state or out-of-state parent institutions sponsoring off-campus programs.

> Question 6: What are the differences and similarities in monitoring requirements for the major areas of concern (authority and need, academic, administrative, and ancillary aspects), for both the states and the accrediting groups?

The most common monitoring requirements focus on academic aspects such as faculty preparation and curriculum, but attention to administrative aspects runs a close second. How the program is planned and administered, and its relation to the decision making process at the main campus are common questions. Facilities and equipment are of interest in most cases. Financial arrangements are usually monitored, sometimes before the fact, and sometimes in a post-audit approach. Particularly the accrediting groups are interested in financial arrangements for the off-campus location as they may affect financial

resources at the main campus.

With respect to ancillary aspects, the monitoring emphasis tends to be slightly in favor of consumer protection rather than services per se for the students. That is, while requirements for catalogs and advertisements could serve the purpose of student information, they could also protect from fraud. This type of requirement was more frequently noted than one for student services, such as counseling. The regionals as well as many states considered the review of learning resources essential. In several cases the possible use of such resources belonging to another entity was noted as an alternative, along with requirements pertaining to such contractual relationships.

With respect to the fourth area (authority and need), state authority to operate is monitored as a precondition to eligibility for accreditation in most jurisdictions. Need for the program was a question raised by a number of states, not only for state planning purposes and the wise use of scarce state resources, but also for assurance that state institutions would have first opportunity in their own markets. As noted earlier, in some instances this may constitute actionable restraint of trade.

Chapter 10

CONCLUSIONS AND IMPLICATIONS

Our concern in this volume has been with control by external entities over a subset of institutional policies and procedures, namely those related to off-campus operations. Findings about the roles of accrediting bodies and the states in monitoring off-campus programs were summarized in the preceding chapter. This chapter discusses the implications of these findings, and provides some suggestions for possible future directions. These implications may be separately identified for discussion purposes, but in truth they are so interwoven that consideration of any one of them implies consideration of the others. Likewise, it is difficult to separate the attention these external entities direct toward policies and procedures for off-campus programs from similar concerns for the entire institution.

These major conclusions and implications emerged from the findings of this study:

1. Increasing attention has been focused on off-campus programs by both the states and accrediting bodies, leading to a dysfunctional overlap in monitoring requirements, but also to some loss of self-determination on the part of institutions.

2. As one result, there is heightened tension about the proper delineation of monitoring roles. Resolving such tensions through the development of complementary and mutually supportive roles is indicated, but may require national attention with joint leadership from organizations such as COPA and SHEEO (State Higher Education Executive Officers). Addressing these concerns will require concerted effort toward mutual as well as public understanding of the assumptions, procedures and opinions of both accrediting bodies and state agencies.

3. Of crucial importance are efforts to strengthen the institution's own responsibility for its off-campus programs, regardless of their near or distant location.

4. Technology has made possible new modes of distance education which an institution can beam into every state; therefore the primary locus of quality assurance more than ever will be with the parent institution, since education consumers will be located in multiple accrediting regions, and in multiple states.

A striking finding of this study has been that institutional accrediting bodies and state agencies are more alike than different in the stance they take about matters that really count in academic operations. To be sure, state agency requirements show greater concern for compliance with specifics of statutes and related procedures, but they also reflect strong allegiance to traditional academic values, such as final accountability of the parent institution, insistence on a credible faculty, and a call for the usual resources needed to support effective instruction, particularly library and learning resources. They also take an increasingly formative approach to program review. For example,

> The California state coordinating agency considers assessment of the quality of academic and vocational programs and the means used for establishing, maintaining, and improving such quality to be one major goal for the 1980s. (Stevens and Hamlett, 1983, p. 36)

In short, both the states and the accrediting bodies tend to be concerned not only with institutional or programmatic quality, but also with its improvement. A review of the purposes of these two entities is germane to this discussion.

> The purpose of a state higher education agency in relation to authorization and licensure is to assure fiscal integrity and at least minimal quality as it relates to consumer protection.
>
> Accreditation has two purposes: to assure the quality of the institution or program, and to assist in its improvement. (p. 3 of this volume)

It is clear that many state agencies, while carrying out their own stated purposes, have also assumed the stated purposes of accrediting bodies. That leads to this question: If the approach used and the ends sought are essentially the same, how many evaluative bodies are needed to assure quality of the academic enterprise? Put another way, are there definably different although complementary roles to be played by accrediting bodies and state higher education agencies?

There is concern at the institutional level, as well as in state agencies and accrediting groups, over the waste of resources that results from such duplication of monitoring efforts. Development of a common data base for gathering quantitative information about post-secondary education would address one aspect of this problem. Currently such an effort is in progress under COPA sponsorship, with the assistance of NCHEMS (National Center for Higher Education Management Systems) and funding from the Ford Foundation. Although at present this data base is being developed only for accreditation purposes, in time some of its elements may also be used by institutions to satisfy data needs related to state agency monitoring. Cooperation between the accrediting community and the state postsecondary agencies, with leadership from COPA and SHEEO, would facilitate such a possibility.

A somewhat surprising finding of this study was that state education agencies focus more specific monitoring attention on programs of out-of-state institutions (Quadrant C - PROG IN) than they do on off-campus programs sponsored by their own institutions (Quadrant A - BOTH IN). As Kaplin (1975) points out, it is of course true that states have a responsibility for registering corporations chartered out-of-state which do business within the state, and they also may impose licensing as well as corporate requirements "as a condition of

offering education within the state, granting degrees, or using a collegiate name" (p. 3). In contrast with the states' general pattern of oversight, the accrediting bodies' monitoring requirements concentrate more on programs of in-region institutions (Quadrant A - BOTH IN). Thus for all practical purposes they leave quality assurance of Quadrant C - PROG IN offerings to the parent institution and its accrediting body based in another of the six regions.

It is likely that state agencies have moved into their monitoring stance with respect to Quadrant C - PROG IN offerings because of what they interpret as a quality assurance vacuum. Whether or not published accounts are factual, they tend to attribute questionable academic practices to the relative distance of off-campus offerings from the supervision of the parent institution. For out-of-state locations, the distant site also may be far from the "sending" institution's accrediting organization, which, according to current accreditation policy, is the regional body responsible for such programs.

Under statute, state agencies generally focus on in-state entities, even though out-of-state organizations may be brought under their jurisdiction through foreign corporation laws. Once a state agency has to deal with an authority located outside of its own state, however, even on matters happening within the state, complications may be expected to arise. In contrast with the in-state focus of state agencies, accrediting bodies customarily operate in an interstate environment.

Identifying <u>complementary</u> rather than overlapping monitoring roles for states and accrediting bodies could lead to a major shift for the states from their current level of attention to out-of-state offerings. For example, for programs offered by out-of-state institutions, the regional accrediting associations, rather than the states, might be

identified as the primary agencies for assurance of academic quality and protection of the public. In such an event, these nongovernmental organizations probably would be acting in a quasi-public role, raising an issue which is discussed later in this chapter. A related issue involves the question of which accrediting body should have this primary responsibility for interstate programs--the regional association of the "sending" institution (current practice), or the regional body with jurisdiction over the instructional site. The latter possibility is being explored by the Western Association at present.

Both precedent and the general climate in state legislatures suggest that the identification of complementary monitoring roles for state agencies and accrediting bodies is both timely and feasible. Precedent lies in the understanding in several states that Quadrant C - PROG IN offerings are to be exempt from state requirements on the basis of accreditation status; and in the understanding reached between the Texas Commission on Higher Education and the Southern Association with respect to monitoring programs offered by institutions located in other states.

The general climate of state legislative attention reflects a growing interest in academic quality as well as concern over effective and efficient use of resources needed. Observations based on an eight-year annual review of state legislative activity by one of the co-authors, although addressed primarily to that affecting community, junior and two-year technical colleges, are pertinent to a discussion of this developing interest in quality. Legislative concern for academic program, curriculum, and accreditation matters has grown enough to justify subcategories of legislative items to permit more detailed analysis of the nature of the concerns in these areas (Martorana and Corbett, 1983).

The concern for academic quality clearly exists, and there is precedent for meeting that concern through complementary and mutually supportive roles for the accrediting bodies and the states. But the states are not going to feel comfortable about relinquishing their monitoring of out-of-state programs to accrediting organizations unless they are convinced that the quality of these programs will receive appropriate attention.

How can the states be reassured? A step in the right direction would be a concerted drive on the part of institutional accrediting bodies to <u>insist</u> that their institutions be as responsible for their extraregional off-campus programs (Quadrant B - INST IN) as they are for their intraregional programs (Quadrant A - BOTH IN). To assure the quality of off-campus programs across the nation, it would follow that each of the regional associations should be equally insistent that its institutions be truly responsible for their own out-of-region (Quadrant B - INST IN) programs. This is standard accreditation policy, recently reiterated in COPA's updated statement on off-campus programs (1983c). Nonetheless, only when states see the positive results of such extraregional monitoring by accrediting bodies will they, perhaps, again be willing to let the institutions and their accrediting organizations be responsible for the quality of their own off-campus offerings.

The reestablishment of "full faith and credit" is all the more urgent since technology is now available to support a relatively new mode of "off-campus education," namely that which an institution may beam via satellite into every one of the states as well as overseas. In the current ALLTEL (Assessing Long Distance Learning Via Telecommunications) Project, principally funded by the Fund for the Improvement

of Postsecondary Education (FIPSE) and jointly sponsored by COPA and SHEEO, an attempt is being made to resolve potential problems posed by national and international telecommunications before individual states legislate barriers to such distance learning--regardless of how futile such a legislative approach may be. State agency executives, accreditation professionals, institutional administrators, and public participants, in a statesmanlike way, have identified and addressed potential problems and are now implementing solutions in the ALLTEL Project. This provides one model for sorting out workable and nonduplicative roles in the monitoring of off-campus programs, particularly those which are interstate in nature.

One possible alternative to increased state agency attention to Quadrant C - PROG IN offerings is that which was recently initiated in the Western region. If a degree-granting operation of an out-of-state institution is to be located in California or Hawaii, its Senior College Commission will evaluate the operation for accreditation, provided certain criteria are met. This was the Western Association's response to a requirement imposed by the state of California.

While there is tension about the proper delineation of states' and accrediting bodies' roles in the monitoring of off-campus programs, there is also evidence of systematic attempts at better communication. For example, the Middle States Commission frequently invites state agency executives to formal and informal meetings with its members, and for some years state agency professionals have worked with Middle States teams on site visits, although they do not take part in the team's recommendation with respect to accreditation status (Middle States Association, 1983). As another example, a three-year

project (primarily funded by FIPSE) has as two of its objectives (1) the defining of appropriate roles for California and Hawaiian state agencies and the Western Association of Schools and Colleges Accrediting Commission for Community Colleges, and (2) developing a plan for coordinated evaluation visits by the accrediting Commission and the respective state agencies.

> The project, at its inception, proposed an experimental definition of role for the Accrediting Commission and the state agencies in the evaluation of the colleges. The accrediting agency should assess the quality of the college--the range, depth, effectiveness of its programs and services, its governance, and how well it serves students. The state agency should concern itself with statewide objectives, and the extent to which the colleges in the aggregate are meeting those objectives. (FIPSE Project: Improving Community College Evaluation and Planning, 1983, p. 1).

In a recent publication, two professionals from the California Postsecondary Education Commission indicated the heavy reliance of state agencies on accreditation, and suggested some reasons.

> Accreditation focuses on capacity and achievement. Assessments are noncompetitive in that no ranking of institutions or programs is done by accrediting agencies. State concerns for quality in education focus on review of resource allocations, access, consumer protection, and productivity....States may rely on accreditation partly because of the different criteria used and partly because of the high cost of institutional reviews to the state. (Stevens and Hamlett, 1983, pp. 35-36)

One implication of accrediting bodies' assistance with either federal or state functions is the gradually shifting character of accrediting, from a strictly private to a quasi-public if not quasi-governmental classification (Kaplin, 1982). Kaplin's message is all the more forceful because it is built on an analysis of court cases which have been tried over accreditation issues. He shows that in the span of approximately forty years (1938 to 1977), the court decisions

indicate clear, progressive growth in sensitivity to the fact that accreditation is an academic activity having a public interest, and that actions by accrediting organizations must be so judged.

> The real choice, therefore, is between the "quasi-governmental" and "quasi-public" labels. The theories underlying both categories are supported by modern legal developments, and both categories have been used receptively in recent accreditation litigation. Courts have not yet been forced to choose between the two, nor is a clear preference for one category over the other yet apparent. (p. 13)

The preference of the accrediting community for the "quasi-public" designation is clear (Miller, 1973; Kaplin, 1982; COPA, 1983a). Related to the distinction between quasi-governmental and quasi-public is the posture of the Middle States Commission about the role of the state's representative when that person works with an accrediting team. While he or she is accorded full participation in the activities of the visiting team, including access to the institution's self-study and documents, that representative does not have full status, that is, does not vote on the team's recommendation with regard to accreditation. To accord that person such full status would imply that the accrediting organization was acting as a quasi-governmental body rather than as a voluntary, nongovernmental membership organization, which is its preference (Middle States Association, 1983).

Kaplin (1982) concluded that "the quasi-public category will likely serve long-range educational and societal needs better than the quasi-governmental category" (p. 13). He supported this conclusion about the quasi-public designation by pointing to a greater body of relevant experience with accreditation cases, to its particular relevance to special problems of professional associations, to legal requirements which are relatively free of technical provisions, and to

the fact that the quasi-public label is better accepted by "the accrediting community and knowledgeable outsiders" (p. 14).

Another implication of this study's findings is that accrediting bodies may find it necessary to recognize the importance of meeting state objectives, as well as institutional objectives, if they do not wish more state involvement with their member institutions' programs. Many states have articulated coordinated systems of postsecondary education, sometimes including private as well as public institutions. Schools which field off-campus programs not in keeping with their institution's mission in such a system may well be acting contrary to the statewide plan. The institution's mission is the most important standard against which accrediting bodies measure its performance; giving attention to institutional mission in relation to the state's plans might also be explored from the standpoint of accreditation policy.

Another implication of the study's findings is that some attempts of state agencies to protect local institutions may not survive litigation. Differential treatment by state agencies of out-of-state schools as compared with in-state schools, when either type wishes to establish an off-campus program, may constitute restraint of trade. In such a case, "need" for the program may be defined as existing only when that need cannot be met by a local institution. When a state agency determines that there is insufficient "need" for the program on these grounds, there is no guarantee that a local school would serve the particular clientele as adequately and conveniently as would the program proposed by the out-of-state institution. A further implication of such monitoring may be that the in-state institution is protected by the state, but possibly at the expense of citizens who are potential consumers of this service from out-of-state institutions.

Insofar as there is misunderstanding about the purposes of accreditation, there is greater risk that an office more directly accountable to the public will be empowered to provide quality control over off-campus programs. One implication is that accrediting bodies should continue to diversify accrediting team membership, on occasion to include faculty, students, and representatives of business, industry, the professions, unions, and other organized community groups, in addition to the academic administrators more usually involved.

A second implication is more complex. It involves contrasting assumptions behind the accreditation process and the state agency review and approval process, and is related to accrediting bodies' mandate to assist with institutional or programmatic improvement. To illustrate, an institution's self-study and visiting team report, if made public, may be misinterpreted because of their intentional emphasis on institutional problems. Sometimes, in fact, little formal attention is given to institutional strengths because such information may be considered less helpful to the institution in its efforts toward improvement. In contrast, the expectation that the institution will candidly identify problems with the objective of seeking assistance is seldom a valid assumption in the state review and approval process. The accreditation emphasis on improvement, with its easily misunderstood documentation, is a primary reason that most institutions and their accrediting bodies insist on confidentiality, while legislatures and some state agencies may press for full disclosure.

This matter may be further complicated if the state has "sunshine" laws, which may require that all public business be conducted in open session. If there is to be mutual respect and support for complementary roles in quality assurance by state agencies and accred-

iting bodies, the issue of disclosure and confidentiality must be resolved. A COPA committee currently is working on this issue, which is another concern that could benefit from joint COPA/ SHEEO discussions.

A final implication of this study's findings is almost a given: it would be most unfortunate if any of the three entities most closely involved in quality assurance--the parent institution, the accrediting body, the state postsecondary agency--should withdraw from close attention to off-campus, military base and study abroad programs. In addition to the usual concern for academic excellence, another reason relates to the expanding definition of off-campus education. Most of the types of programs discussed in this volume take place in a classroom. The technology of telecommunications and computers is already supplementing this model, however, with less emphasis on traditional classroom interaction, but with greater attention to nontraditional-types of instructor-student communication. When an institution beams its programs across the country for the benefit of students whom no one at the college will ever see, its responsibility for quality assurance increases commensurately. The responsibilities of accrediting bodies and state agencies may also be expected to change in order to accommodate these new directions.

In short, four major conclusions or implications emerged from this study's findings: the dysfunctional overlap of off-campus monitoring required by accrediting bodies and state postsecondary agencies; the need for national leadership and open communication to resolve the tensions resulting from this duplication; the importance of strengthening the institution's responsibility for all its off-campus programs,

especially those at distant locations; and the changes in monitoring responsibilities which may result as nationwide "off-campus" offerings via telecommunications and computer technology begin to span multiple states and multiple accrediting regions.

The proper delineation of roles in quality assurance is the central issue emerging from this study. Systematic national attention is now called for, in order to work out complementary and mutually supportive, but not duplicative, roles for parent institutions, accrediting bodies, and state postsecondary agencies.

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